

**Dover District Council**

**Publication Dover District  
Local Plan (Reg 19)  
Sustainability Appraisal**

**Final report**

Prepared by LUC  
September 2022

**Dover District Council**

**Publication Dover District Local Plan (Reg 19)  
Sustainability Appraisal**

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# Chapter 1

## Introduction

**1.1** This report has been prepared by LUC on behalf of Dover District Council to document the current stage of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Dover Local Plan.

**1.2** This report relates to the Regulation 19 version of the Local Plan (the Publication Local Plan) and should be read in conjunction with that document.

**1.3** A similar SA Report was prepared for consultation alongside the Regulation 18 version of the Local Plan (the Draft Local Plan) in January 2021.

### Dover District

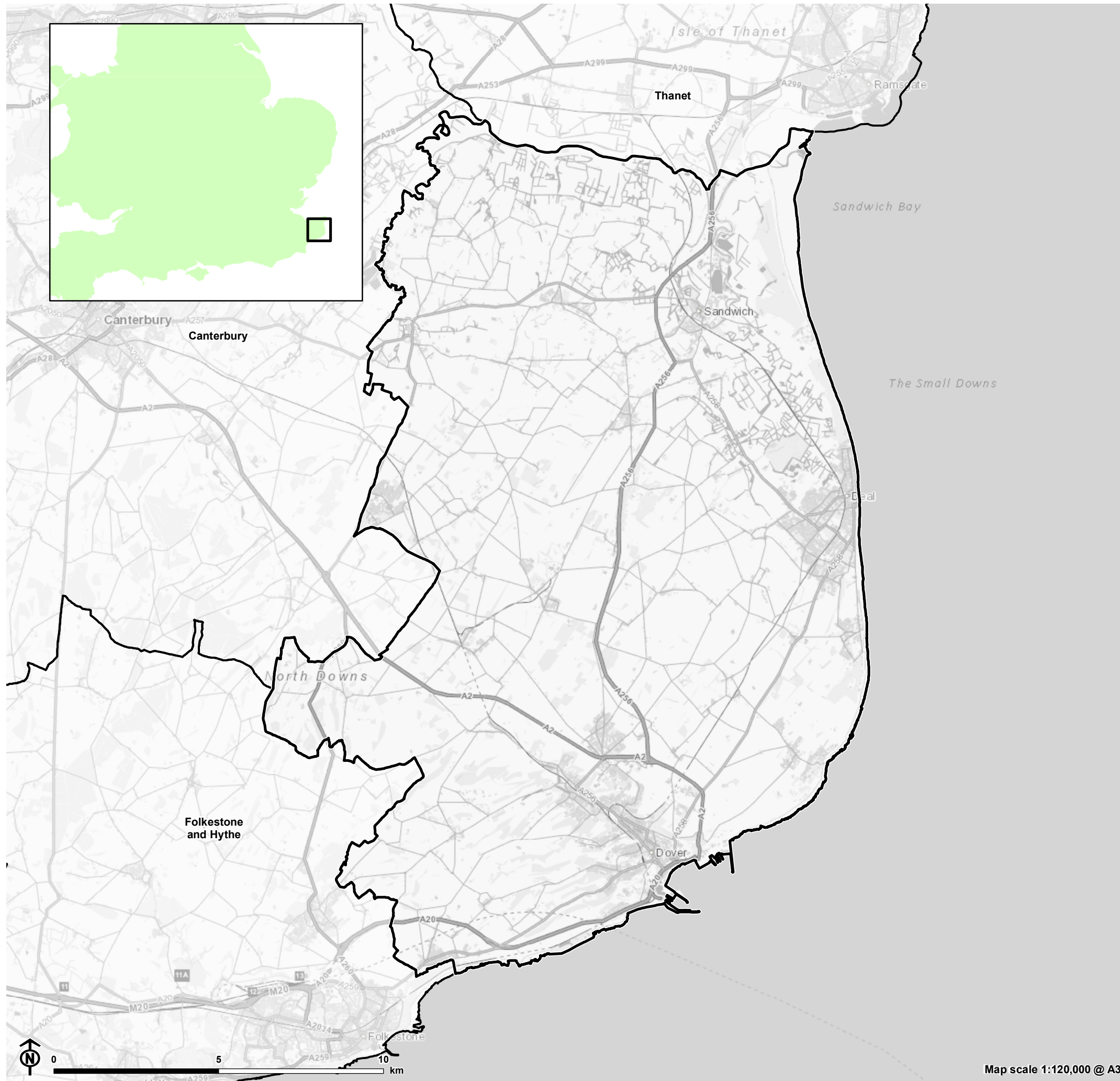
**1.4** Dover District lies on the East Kent peninsula in between Thanet to the north, Folkestone and Hythe to the south west and Canterbury to the north west. To the south and east of the District is the English Channel (see **Figure 1.1**).

**1.5** Dover's historic port is one of the UK's most important commercial gateways to and from continental Europe. The District is connected to the national trunk road network from both the M20/A20 route via Folkestone, Ashford and Maidstone and the M2/A2 route via Canterbury and Faversham. The District is served by mainline rail services to London, with the three main towns of Dover, Deal and Sandwich all connected to High Speed Rail One. Dover is also positioned in close proximity to Channel Tunnel Rail Link services accessed from Folkestone and Eurostar from Ashford to the west.

**1.6** The District's rich maritime history has created diverse and detailed patchwork landscapes, townscapes and seascapes, including the Kent Downs Area of Outstanding Natural Beauty (AONB) and a Heritage Coast, both of which are home to a wide range of ecological and historic assets. Beyond the limits of the District's three main settlements of Dover, Deal and Sandwich, the District is predominantly rural with a relatively even distribution of villages.

**1.7** Current trends in relation to the various social, economic and environmental issues affecting Dover are described in more detail in **Appendix B**. Without the implementation of the Local Plan, such trends are likely to continue. Although the adopted Core Strategy and Land Allocations Local Plan go some way towards addressing many of the issues, the emerging Local Plan offers opportunities to affect existing trends directly and strongly in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.

Figure 1.1: Dover District



- District boundary
- Neighbouring district boundary



Map scale 1:120,000 @ A3

## Adopted Dover District Development Plan

**1.8** Dover District Council formally adopted its Core Strategy on 24<sup>th</sup> February 2010. The Core Strategy allocates a number of strategic sites and contains the Core Policies and Development Management Policies to guide the future development of the District. The Core Strategy was followed by a Land Allocations Development Planning Document on 28<sup>th</sup> January 2015. The Land Allocations Local Plan identifies and allocates specific sites for employment, retail and housing development to deliver the aims of the Core Strategy.

**1.9** Several policy developments have occurred since the adoption of these development planning documents:

- The Regional Spatial Strategy used to determine the scope of the Core Strategy and the housing need of the Plan period has since been revoked and replaced by the National Planning Policy Framework (NPPF) and Guidance (NPPG) in 2012, and which has been subsequently updated, most recently in 2021 and 2022, respectively. The NPPF and NPPG require the preparation of clear, streamlined Local Plan documents as opposed to multiple development management documents.
- The Government has published a new standard approach for local authorities to follow when assessing housing need and preparing their 5-year housing land supply requirements.
- The Government has published a white paper entitled 'Planning for the Future' (August 2020) consulting on various proposals to streamline and reform the planning system, including plan-making. The consultation ran until the end of October 2020. The Government is now in the process of considering the consultation responses.
- The Government published a white paper entitled 'Levelling Up the United Kingdom' (February 2022) on how opportunities will be spread more equally across the UK. The text now comprises the Levelling-up and Regeneration Bill, which has been sent to a Public Bill Committee for scrutiny and will be reported on towards the end of September 2022.

**1.10** Consequently, the Council has updated its evidence base to support the new Local Plan to 2040. The Local Plan document includes strategic, site allocation and development management policies to meet and manage the District's housing, employment and other land use needs, as well as protect and conserve the District's natural, cultural and historic assets.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.11** The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to SA. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

**1.12** SEA is also a statutory assessment process, required under the SEA Directive<sup>1</sup>, transposed in the UK by the SEA Regulations<sup>2</sup> and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments<sup>3</sup>, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes were made by this instrument to the way the SEA regime currently operates. Therefore, the SEA Regulations remain in force, and it is a legal requirement for the Dover District Plan to be subject to SA and SEA throughout its preparation. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>4</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive, is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development.”

<sup>1</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>3</sup> Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232.

<sup>4</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

**1.13** SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government's Planning Practice Guidance<sup>5</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Dover District Local Plan is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

### Meeting the requirements of the SEA regulations

**1.14 Table 1.1** signposts the relevant sections of this SA Report that meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SA of the Dover Local Plan). This table will be included in the full SA Report at each stage of the SA to show how the requirements of the SEA Regulations have been met through the SA process.

**Table 1.1: Requirements of the SEA Regulations and where these have been met**

SEA Regulations Requirements	Where Covered in this Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	<b>Chapters 1, 3, 7 and Appendix B</b> of this SA Report.
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
c. The environmental characteristics of areas likely to be significantly affected.	
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
f. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	<b>Chapters 4, 5, 6 and 7</b> of this SA Report.
g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	<b>Chapter 7</b> of this SA Report.
h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	<b>Chapters 5, 6, 7 and Appendix D</b> of this SA Report.

<sup>5</sup> See <https://www.gov.uk/government/collections/planning-practice-guidance>.



SEA Regulations Requirements	Where Covered in this Report
i. A description of measures envisaged concerning monitoring in accordance with Reg. 17.	<b>Chapter 8</b> of this SA Report.
j. A non-technical summary of the information provided under the above headings.	A separate non-technical summary document has been prepared to accompany this SA Report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).	Addressed throughout this SA Report.
Consultation requirements	
Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).	Focused consultation on the scope and level of detail of the SA was carried out with the Environment Agency, Historic England, and Natural England for 5 weeks in February and March 2018.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).	Regulation 18 consultation on the Dover District Local Plan took place between January and March 2021. The consultation documents were accompanied by an SA Report.  Regulation 19 consultation on the Dover District Local Plan is taking place in October through to December 2022. The consultation documents are accompanied by this SA Report.
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	The Local Plan is not expected to have significant effects on other EU Member States.
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16).	
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>■ The plan or programme as adopted;</li> <li>■ A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ The measures decided concerning monitoring.</li> </ul>	To be addressed after the Local Plan is adopted.
<b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17).	To be addressed after the Local Plan is adopted.

SEA Regulations Requirements	Where Covered in this Report
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

## Structure of this Report

**1.15** This chapter has introduced Dover District, the Dover District Local Plan, and the SA process. The remainder of the report is structured into the following chapters:

- **Chapter 2** describes the method used to carry out the SA and the difficulties encountered in applying that method.
- **Chapter 3** describes the relationship between the Local Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the District and identifies the key sustainability issues.
- **Chapter 4** describes the results of the SA of the growth and spatial options considered in the drafting of the Local Plan.
- **Chapter 5** describes the results of the SA of the site options considered for allocation in the Publication Local Plan.
- **Chapter 6** describes the results of the SA of the Draft Local Plan (Regulation 18) policy options included within the Draft Local Plan.
- **Chapter 7** describes the results of the SA of the Publication Local Plan (Regulation 19) policies, including reasonable alternative policy options not previously considered during the preparation and SA of the Draft Local Plan.
- **Chapter 8** sets out the SA monitoring framework for monitoring the significant effects of the Publication Local Plan.
- **Chapter 9** sets out conclusions relating to the SA findings presented in the preceding chapters of the SA Report and the next steps in the Local Plan and SA processes.
- **Appendix A** summarises the representations received during the consultation of the SA Scoping Report in 2018 and the SA Report which accompanied the Draft Dover District Local Plan in 2021, responds to each comment, referring to associated changes to the SA where appropriate.
- **Appendix B** sets out the detailed sustainability and policy context of the Dover Local Plan, used to inform the SA Framework.
- **Appendix C** sets out the detailed residential and employment site assessment criteria used to identify the likely significant effects of the site options considered for allocation in the Draft Local Plan.
- **Appendix D** sets out the Council's reasons for the selection of sites for allocation in light of the reasonable alternatives identified.
- **Appendix E** provides the results of the Sequential and Exception Tests, in accordance with the national Planning Practice Guidance.
- **Appendix F** includes the assessment proforma for all the site options appraised in **Chapter 5** of the SA Report.

## Chapter 2 Methodology

**2.1** In addition to complying with legal requirements, the approach being taken to the SA of the Dover Local Plan is based on current best practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance.

**2.2** This calls for SA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Figure 2.1: Corresponding stages in plan-making and SA



**2.3** The sections below describe the approach that has been taken to the SA of the Dover District Local Plan to date and provides information on the subsequent stages of the process.

## Stage A: Scoping

**2.4** The Scoping stage of SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows.

### Review other relevant policies, plans and programmes to establish policy context

**2.5** The Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report (also referred to as the SA) to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

**2.6** A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered relevant to the scope of the Local Plan. The review is presented in **Appendix B**.

### Collect baseline information to establish sustainability context

**2.7** Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.

**2.8** Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the local plan to understand the likely future sustainability conditions in the absence of the local plan.

**2.9** The SEA Regulations require the Environmental Report (the SA) to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the SA to report on cumulative effects, another requirement of the SEA Regulations.

**2.10** The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. Baseline information for the District is presented in **Appendix B**.

### Identify sustainability issues

**2.11** The baseline information also allows the identification of existing sustainability issues, including problems as required by the SEA Regulations.

**2.12** Sustainability issues and their likely evolution without the Local Plan are detailed in **Appendix B** and summarised in **Chapter 3**.

### Develop the SA framework

**2.13** The relevant sustainability objectives identified by the review of other policies, plans, and programmes together with the key sustainability issues facing the District, identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the 'SA framework') against which the effects of the plan would be assessed. These objectives also take into account the types of issues that are capable of being affected by the land use planning system.

**2.14** Development of the SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. The SA framework that has been used in this way throughout the plan-making process is presented in **Chapter 3**.

### Develop the site appraisal framework

**2.15** To assist consistency and transparency when assessing the likely sustainability effects of development site options considered for allocation in the Local Plan, the SA Framework is supported by a set of site assessment criteria and assumptions. More detail on the criteria and assumptions used by the SA is provided in **Appendix C** of this SA Report.

### Consult on the scope and level of detail of the SA

**2.16** Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

**2.17** The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) are consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report. The scope and level of detail of the SA is governed by the SA framework and the statutory consultees (and the local authority areas which surround Dover District) have therefore been consulted on this when it was developed as part of the scoping process for the SA Report<sup>6</sup>. This consultation on the SA Scoping Report was undertaken for a five week period in February and March 2018.

**2.18** **Appendix A** summarises the representations that were received during the consultation on the SA Scoping Report and the SA Report that accompanied the Draft Dover District Local Plan and responds, highlighting amendments to the review of policies, plans, and programmes, the baseline information, key sustainability issues, the SA framework and the SA assumptions where relevant.

## Stage B: Developing and Refining Options and Assessing Effects

**2.19** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other ‘reasonable alternatives’ to the options being considered for a plan.

**2.20** In relation to the SA Report, Regulation 12 (2) of the SEA Regulations requires that:

“The report must identify, describe and evaluate the likely significant effects on the environment of—  
(a) implementing the plan or programme; and  
(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”

**2.21** The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are ‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unsuitable, unavailable or undeliverable.

**2.22** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

**2.23** The following sections describe the process that was followed in identifying and appraising options for the Local Plan. The alternative options were identified by the Council based on the most up-to-date evidence. The stages of option development and accompanying SA to date are outlined below.

<sup>6</sup> This original scoping process is described in the SA Scoping Report prepared by LUC in February 2018.

## Identifying and appraising the options for the Regulation 18 Draft Local Plan

### Growth and spatial options

**2.24** The Council's first priority in the development of its new Local Plan was to identify and appraise a range growth and spatial options.

- Growth options represent the range of potential scales of housing and economic growth that could be planned for over the Local Plan's lifespan (the Local Plan period).
- Spatial options represent the range of potential locational distributions for the various growth options over the Local Plan period.

**2.25** In light of the Council's existing evidence and policy considerations, three potential scales and five potential distributions of growth were identified for consideration and appraisal in the SA. Given the distribution of growth, i.e. its pattern and extent cannot be determined without an accurate sense of its scale, neither concept can be considered or appraised in isolation. Therefore, all potential combinations of the reasonable scales and distributions of growth identified have been appraised – fifteen options in total. Further details on the options considered and appraised, as well as each option's potential significant effects can be found in Chapter 4 and Appendix C of the SA Report that accompanied the Draft Local Plan during the Regulation 18 consultation in early 2021, in addition to **Chapter 4** of this SA Report, which accompanies the Publication Local Plan during the Regulation 19 consultation in late 2022.

### Site options

**2.26** Residential, gypsy and traveller and employment site options were appraised as part of the SA and drafting of the Draft Local Plan. Additional site options considered following the consultation on the draft Local Plan and during the preparation of the Publication Local Plan were subsequently appraised in the SA alongside the options appraised earlier in the plan-making process.

**2.27** Further details on the options considered and appraised, as well as each option's potential significant effects can be found in **Chapter 5. Appendix F** includes assessment proforma for all the site options appraised in **Chapter 5** of the SA Report.

### Policy options

**2.28** The scope and detail of the preferred policies set out within the Publication (Regulation 19) Local Plan has been informed by the baseline evidence on the District's environmental, social and economic needs, sensitivities and opportunities. Alternative policy approaches were considered for all policies within the Draft Local Plan. **Chapter 6** describes the options considered in the drafting of the preferred policies outlined in the Draft (Regulation 18) Local Plan and highlights their likely differences in significant effects before the appraisal of the preferred policies. **Chapter 7** describes the additional options considered in the drafting of the policies in the Publication (Regulation 19) Local Plan and highlights their likely differences in significant effects before the appraisal of the final policies.

## Appraisal methodology

**2.29** Reasonable alternative options considered in the preparation of the Regulation 19 Publication Local Plan have been appraised against the SA objectives in the SA framework set out in **Chapter 3**.

**2.30** The likely effects of site allocation and policy options need to be determined and their significance assessed, requiring a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols. **Figure 2.2** illustrates the full range of potential effects identified through the SA process. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (-) has been used to distinguish significant effects from more minor effects (+ or -), this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect, taking into account other factors that may influence the achievement of that objective. Where a potential positive or negative effect is uncertain, a question mark is added to the relevant effect (e.g. +? or -?) and the effect is colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

Figure 2.2: Key to symbols and colour coding used in the SA of the Dover District Local Plan

++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.
+	Minor positive effect likely.
+/- or +/-	Mixed minor or significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
--	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

### Stage C: Preparing the Sustainability Appraisal Report

**2.31** This SA Report describes the process that has been undertaken in carrying out the SA of the Dover District Local Plan. It sets out the findings of the appraisal of options, highlighting any likely significant positive and negative effects and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects.

**2.32** These findings are set out in **Chapters 4, 5, 6 and 7** of this SA Report. The Environmental Report also makes recommendations for improvements and clarifications that may help to avoid or mitigate negative effects and maximise the benefits of the policies. These recommendations are recorded in **Chapters 6 and 7**.

### Stage D: Consultation on the Local Plan and the SA Report

**2.33** Information about consultation on the SA that has already taken place at earlier stages of plan-making has been provided above.

**2.34** Dover District Council is inviting comments on the Regulation 19 Publication Local Plan and this accompanying SA Report. These documents are being published on the Council's website for consultation in October through to December 2022. Consultation comments received on this SA Report document will be taken into account and reported on in the remaining stages of the SA.

### Stage E: Monitoring Implementation of the Local Plan

**2.35** Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Dover District Local Plan are set out in **Chapter 8**.

## Assumptions and Uncertainty

### Assumptions to be applied during the SA

**2.36** SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed area-based assessment criteria and a series of associated precautionary assumptions have been developed and applied. These assumptions set out clear parameters within which certain effects are identified against each SA objective in the SA framework. These detailed criteria and associated precautionary assumptions are presented in **Appendix C**. These assumptions were applied through the use of Geographical Information Systems (GIS).

**2.37** The criteria draw on the most up to date international, national, regional and local data sets available for each SA objective and take into account relevant comments made during the consultation on the SA Scoping Report.

## Difficulties Encountered

**2.38** The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

**2.39** Notable limitations of the SA process to date include:

- The growth and spatial options represent strategic principles for the scale and distribution of growth to be delivered over the Plan period. Consequently, the SA focusses on the likely strategic implications of their implementation. This approach ensured that all options could be appraised consistently.
- The site options were appraised using the most up to date environmental, social and economic evidence available, for example the assessment of site options effects on the District’s historic environment, landscapes and townscapes drew off Council officer assessments that considered designated and non-designated assets.
- A 1% overlap concession has been applied to all relevant site assessment criteria set out in **Appendix C** to avoid minor digitising errors affecting ratings. For example, a site which borders a designation boundary and only fractionally overlaps with it will not be downgraded where the overlap is equal to or less than 1% of the total site area. This approach was taken to avoid site options being unnecessarily rated poorly where significant adverse effects are likely to be easily avoidable.
- When applying the criteria and assumptions set out in **Appendix C** to inform the SA of site options, distances were measured from the nearest point of a site to the nearest point of the feature(s) in question, which may not always accurately reflect the distance to features for the whole of a site, particularly large sites. This is to ensure a consistent approach for the SA. The Council has examined site options and the evidence to supplement the SA process in selecting preferred development locations and policies.
- The sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has not been possible within the resources available to consider every potentially relevant document in detail (see **Chapter 3** and **Appendix B**). However, we have drawn out the key messages relevant to the preparation of the Local Plan and the SA.
- In the absence of a comprehensive GIS data layer that included employment sites of all sizes and types across the District, areas of employment identified at the time of appraisal were used in the analysis, namely Strategic Employment Sites and Enterprise Zones.

**2.40** Similarly, with regard to the evidence base set out in **Chapter 3** and **Appendix B** upon which effects have been identified, every effort has been made to ensure that the SA Report reflects the latest baseline information. The SA of future iterations of the Dover Local Plan and associated new reasonable alternatives will continue to benefit from the most recent, accurate and consistent evidence available.

## How the Sustainability Appraisal Process has Influenced the Contents of the Publication Local Plan

**2.41** As part of the preparation of the Local Plan the Council identified and appraised a range of growth and spatial options through the SA process. This work was used to inform the quantum and distribution of housing and economic growth set out in the Regulation 18 Draft Local Plan.

**2.42** The SA Report prepared and published alongside the Regulation 18 Draft Local Plan identified the effects of the policies within the Draft Local Plan. These effects were used alongside updates to the Council’s evidence base and representations from the Regulation 18 consultation to make changes to the policies in the Regulation 19 Publication Local Plan.

**2.43** In taking into consideration the recommendations of the SA the Council has tried to ensure that an appropriate balance is struck between avoiding adverse effects and not prejudicing the viability and or/deliverability of certain developments with further adverse, and potentially significant, effects against other SA objectives (e.g. housing and employment). The Council considers that the policies in the Plan provide such a balance and are in line with legal and planning requirements. Furthermore,



when looking at the effects of the policies identified in the SA, it is important to note, that in the majority of cases, these can be mitigated by other policies in the Plan, and that the Plan should be read as a whole.

**2.44** Whilst the SA has informed the site allocation selection, the overall effect ratings from the Sustainability Appraisal process were not the only determining factor and further information on the selection of the site allocations is set out in **Appendix D**. Where effects have been identified both in the SA and the HRA, in relation to proposed housing and employment site allocations, these have been addressed through specific criteria in the site allocations policies in the Regulation 19 Publication Local Plan.

## Chapter 3

# Sustainability Context for Development in Dover and the SA Framework

**3.1** The Dover District Local Plan is not prepared in isolation and is influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and the historic environment.

**3.2** It must also conform to environmental protection legislation and the sustainability objectives established at international, national and regional level.

**3.3** Schedule 2 of the SEA Regulations requires:

(a) “an outline of the...relationship with other relevant plans or programmes”; and

(e) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.

**3.4** It is necessary to identify the relationships between the Dover District Local Plan and the relevant plans, policies and programmes so that any potential links can be built upon, and any inconsistencies and constraints addressed.

**3.5** An outline of the contents and main objectives of the Dover Local Plan can be found in **Chapter 7**. The relationships between the Dover Local Plan and other relevant plans, policies and programmes are set out below and in **Appendix B**.

### Key International Plans, Policies and Programmes

**3.6** Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) were transposed into the Strategic Environmental Assessment (SEA) Regulations<sup>7</sup> and Habitats Regulations<sup>8</sup>. Following the UK’s departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Dover Local Plan. These processes should be undertaken iteratively and integrated into the production of the Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

**3.7** There are also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK. The relevant associated Regulations are discussed in **Appendix B**.

### Key National Plans, Policies and Programmes

**3.8** The most significant national policy context for the Local Plan is the National Planning Policy Framework (NPPF), which was originally published in 2012 and has been periodically updated (most recently in 2021<sup>9</sup>). The Local Plan must be consistent with the requirements of the NPPF, which states:

<sup>7</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>8</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

<sup>9</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

**3.9** The NPPF sets out information about the purposes of local plan-making, stating that plans should:

- “be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”.

**3.10** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- “Housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

**3.11** The NPPF also promotes well-designed places and development, and plans should “at the most appropriate level, set out a clear design vision and expectations”.

**3.12** Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

**3.13** The NPPF also states that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

## Neighbourhood Plans

**3.14** The Localism Act (2011) sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.

**3.15** Neighbourhood Plans must be consistent with the requirements of the NPPF and be in ‘general conformity’ with the Local Plan for the area. Once adopted, Neighbourhood Plans form part of the statutory development plan for the district within which they are located. The NPPF sets out information about the purposes of Neighbourhood Plan-making, stating that:

“Neighbourhood planning gives communities the power to develop a shared vision for their area.”

**3.16** The NPPF also states that Neighbourhood Plans “can shape, direct and help to deliver sustainable development”, but they should not promote less development than set out in the strategic policies in a Local Plan covering the neighbourhood area or undermine those strategic policies. Within this context, Neighbourhood Plans typically include policies to deliver:

- Site allocations for small and medium-sized housing.
- The provision of infrastructure and community facilities at a local level.
- Establishing design principles.
- Conservation and enhancement of the natural and historic environment.

**3.17** Seven Neighbourhood Plan Areas have been defined in Dover District:

- Ash.
- Dover Town.
- Langdon.
- Sandwich.
- Shepherdswell.
- St Margaret’s.
- Worth.

**3.18** The Shepherdswell Neighbourhood Plan is not currently being progressed, following a decision by the Parish Council at a meeting in September 2015 to stop working on a Neighbourhood Plan.

**3.19** Worth Parish Council Neighbourhood Plan was made in 2014 and the Ash Parish Council Neighbourhood Plan was made in September 2021.

## Sustainability Context

**3.20** Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(3) The environmental characteristics of areas likely to be significantly affected.”

**3.21 Appendix B** of this report sets out the detailed policy context, baseline, and key sustainability issues (including their likely evolution without the Local Plan) for each SA subject area, including the topics required to be covered by the SEA Regulations. Separate sections of **Appendix B** cover the following subject areas:

- Population Growth, Health and Well-being.
- Economy.
- Transport Connections and Travel Habits.
- Air, Land and Water Quality.
- Climate Change Adaptation and Mitigation.
- Biodiversity.
- Historic Environment.
- Landscape.

**3.22** The description of the likely future evolution of the baseline and key issues without the Local Plan considers past trends and current pressures. It is recognised that development in Dover District will not be delivered in isolation from those areas around it. The effect of delivering new development and supporting infrastructure will often be transmitted across administrative boundaries. As such, the SA Report also considers the cumulative effect of delivering new development with consideration for growth being proposed in neighbouring authority areas.

**3.23** SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Data gaps are referenced where necessary. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data is published.

## Key Sustainability Issues

**3.24** Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”

**3.25** The key issues identified through the analysis of the baseline and the policy context are summarised in **Table 3.1**.

**3.26** The likely evolution of these issues without implementation of the Local Plan is set out in detail in **Appendix B**.

**Table 3.1: Key sustainability issues for Dover District**

<b>A. Population, Health and Well-being</b>
A1. Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities.
A2. There is a need for affordable housing across Dover. At present, the mean price of dwellings is higher than the national average. The Local Plan will help with its delivery.
A3. There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to-date Local Plan, the required housing is less likely to be delivered.
A4. There is a need to reduce the gap between those living in the 10% most deprived areas of Dover town and those living in the least deprived areas of Dover. Dover District contains deprivation ‘hot spots’ that are geographically close to some of the least deprived parts of the country. The Local Plan presents an opportunity to address this through the planning of new and improved communities and infrastructure.
A5. Levels of obesity in the District exceed the national average. The Local Plan can tackle the health of its residents more generally in an integrated fashion by providing for, or encouraging access to, healthcare facilities and opportunities to exercise and travel on foot and by bicycle.
A6. The quality of the District’s green and open spaces can be improved. The Local Plan will help to ensure that the accessibility and quality of local green spaces (new and existing) are planned alongside new development in the District.
A7. As the population of the District continues to rise, the District’s existing local services, facilities and infrastructure will be required to expand to meet local needs. The Local Plan provides a means to embed this thinking in the locations for new development.
<b>B. Economy</b>
B1. Job density in Dover District will continue to lag behind other Kent Districts without coordinated action in the Local Plan to promote regeneration of its town centres, improve the sustainability and prosperity of the rural economy and the provision of appropriate employment space.
B2. The Local Plan offers an opportunity to capitalise on the regional investment at Dover Port, Waterfront and the Town Centre by diversifying and expanding the District’s employment areas industrially and geographically to provide equality of access and opportunity.
B3. Uncertainty exists over what the economic impacts of Britain’s exit from the EU and COVID-19. The Local Plan will need to offer sufficient flexibility to respond to these uncertainties.

<b>C. Transport Connections and Travel Hubs</b>
C1. Port-related congestion along the M20/A20, M2/A2 and A256 is resulting in delays on the local network, which has implications for the wider strategic network. It is also associated with poor air quality. Housing and employment growth have the potential to exacerbate this congestion and the associated air, noise and light pollution it generates.
C2. Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people's access to services, facilities and employment.
<b>D. Air, Land and Water Quality</b>
D1. The District contains some of the county's best and most versatile agricultural land, most notably around Sandwich, as well as many valuable mineral reserves. The Local Plan provides an opportunity to ensure that these natural assets are not lost or compromised by future growth in the District by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile.
D2. The District's Source Protection Zones are concentrated in the southern third of the District, with a significant concentration of Zones to the north-west of Dover. The Local Plan provides an opportunity to direct inappropriate development away from Source Protection Zones.
D3. There are two Air Quality Management Areas in Dover District, which have been designated because these areas exceed the annual mean Air Quality Strategy objective for nitrogen dioxide caused primarily by road traffic emissions. The Local Plan can contribute to wider regional measures to mitigate these exceedances without inhibiting the need for the District to grow.
D4. Groundwater sources in Dover District are over-abstracted. Dover falls within the Dour WRZ and Thanet WRZ, both of which will experience a shortfall in supply relative to demand up to 2031. A Local Plan provides an opportunity to ensure that water efficiency measures are implemented over the Plan period.
D5. Water bodies in Dover District are failing to meet the Water Framework Directive objective of 'Good Status'. The Local Plan provides an opportunity to implement plans to improve water quality.
D6. Small increases in wastewater flows are expected across Dover District, following future development. However, the capacity of the sewerage network could pose a threat to meeting these future development needs, particularly in Whitfield, although work is underway to resolve these. The Local Plan provides an opportunity to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Whitfield area) is put in place.
<b>E. Climate Change Adaptation and Mitigation</b>
E1. Hotter, drier summers expected under climate change have the potential for adverse effects on human health. A Local Plan offers another opportunity to update the District's approach to managing the effects of the changing climatic and associated weather events, particularly in the design of new buildings and green infrastructure.
E2. Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks can be managed effectively through the Local Plan and any associated update to the Council's Green Infrastructure Strategy.
E3. Flood risk to Dover District is dominated by tidal flooding, particularly to the north of Deal, where the coastal defence structures are at greatest risk of breaching. The expected magnitude and probability of significant fluvial, tidal ground and surface water flooding is increasing in the District due to climate change. The Local Plan offers an opportunity to contribute further to mitigate the potential effects of flooding by avoiding development in areas vulnerable to flood risk.
E4. The District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Furthermore, the location of new development within a sustainable pattern of development is also key to addressing the climate change challenge.
<b>F. Biodiversity</b>

F1. Dover contains a number of designated biodiversity sites. All of these biodiversity assets, most notably the Thanet Coast and Sandwich Bay SPA and Ramsar Site, could be harmed by inappropriate development. The Local Plan provides an opportunity to evaluate the condition of the District's habitats and employ measures to ensure that future growth in the District does not adversely affect their current condition but where possible contributes to their improvement and connection.

F2. Green networks for wildlife and natural green spaces need to be set out clearly in the District Local Plan and any associated GI Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate.

#### G. Historic Environment

G1. There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve accessibility and interpretation of it.

#### H. Landscape

H1. The District contains a number of distinct rural landscapes which could be harmed by inappropriate development. The Local Plan offers an opportunity to ensure that designated landscapes (such as the Kent Downs AONB) are protected and enhanced as appropriate and that development outside these designations is sited and designed to take account of the variation in landscape character across the District.

### The SA Framework

**3.27** As described in **Chapter 2**, the SA appraises the likely significant effects of the Local Plan in relation to whether they will help to meet a set of sustainability objectives – the 'SA framework'. The sustainability objectives and supporting appraisal questions were defined by reference to the key sustainability issues facing the District (see **Table 3.1**) and the international, national, and sub-regional policy objectives that provide the context for the Local Plan (see **Appendix B**).

**3.28** The SA framework is set out in **Table 3.2**. The penultimate column indicates the relationship between the sustainability issues and the SA objectives. The final column indicates the relationship between the SA objective and the SEA Regulation environmental topics: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; and landscape.

**Table 3.2: Sustainability appraisal framework**

SA Objective	Appraisal Questions: Will the Plan/option lead to...?	Relevant Key Issue (see <b>Table 3.1</b> )	Relevant SEA Topics
<b>Population Growth, Health and Well-being</b>			
SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	SA 1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period?  SA 1.2: Does the Plan allocate small, medium to large scale sites to deliver homes in the short, medium and long term?  SA 1.3: Do the Plan's allocations safeguard and enhance the identity of the District's existing communities and settlements?	A and A2	Population, Human Health and Material Assets
SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration.	SA 2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all?	A3, A4, A5, A6 and A7	Population, Human Health and Material Assets
<b>Economy</b>			
SA 3: To deliver and maintain sustainable and diverse employment opportunities.	SA 3.1: Does the District have an adequate supply of land and infrastructure to meet the District's forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?  SA 3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?  SA 3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?  SA 3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?	B1, B2 and B3	Population, Human Health and Material Assets



SA Objective	Appraisal Questions: Will the Plan/option lead to...?	Relevant Key Issue (see <b>Table 3.1</b> )	Relevant SEA Topics
	<p>SA 3.5: Does the Plan support the prosperity and diversification of the District's rural economy?</p> <p>SA 3.6: Does the District have sufficient education facilities to help provide the working population with the skills the District's existing and future employers need?</p>		
<p>SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.</p>	<p>SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complimentary mix of land uses?</p> <p>SA 4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks?</p> <p>SA 4.3: Does the Plan facilitate working from home and remote working?</p> <p>SA4.4: Does the Plan help to address road congestion, particularly congestion in locations also suffering from congestion related to Port activity?</p>	<p>C1 and C2</p>	<p>Air, Climatic Factors, Population and Human Health</p>
Air, Land and Water Quality			
<p>SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters.</p>	<p>SA 5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land?</p> <p>SA 5.2: Does the Plan prioritise development of poorer quality agricultural land of the District's best and most versatile agricultural land?</p> <p>SA 5.3: Does the Plan minimise development in mineral safeguarding areas?</p> <p>SA 5.4: Does the Plan direct inappropriate development away from source protection zones?</p> <p>SA 5.5: Does the Plan minimise water use?</p> <p>SA 5.6: Does the Plan address capacity issues in the District's wastewater infrastructure, most notably at Whitfield, and safeguard and enhance the quality of the District's ground, surface and coastal waters?</p> <p>SA 5.7: Does the Plan encourage the reuse and sourcing of local materials?</p>	<p>D1, D2, D3, D4, D5 and D6</p>	<p>Soil, Water, Biodiversity, Human Health, Flora and Fauna and Landscape</p>

SA Objective	Appraisal Questions: Will the Plan/option lead to...?	Relevant Key Issue (see Table 3.1)	Relevant SEA Topics
	SA 5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?		
SA 6: To reduce air pollution and ensure air quality continues to improve.	SA 6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?	D3	Air, Climatic Factors and Human Health
<b>Climate Change Adaptation and Mitigation</b>			
SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change.	SA 7.1: Does the Plan avoid placing people and property in areas of flood risk, or where it exceptionally does, is it safe without increasing flood risk elsewhere, taking into account the impact of climate change?  SA 7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure?	E1, E2 and E3	Water, Soil, Climatic Factors and Human Health
SA 8: To mitigate climate change by actively reducing greenhouse gas emissions.	SA 8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat?  SA 8.2: Does the Plan promote and facilitate sustainable patterns of development, the use of electric cars, and sustainable modes of transport?	E4	Water, Soil, Climatic Factors and Human Health
<b>Biodiversity</b>			
SA 9: To conserve, connect and enhance the District's wildlife habitats and species.	SA 9.1: Does the Plan avoid and mitigate adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?  SA 9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?  SA 9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?	F1 and F2	Biodiversity, Flora and Fauna and Landscape

SA Objective	Appraisal Questions: Will the Plan/option lead to...?	Relevant Key Issue (see <b>Table 3.1</b> )	Relevant SEA Topics
	SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?		
Historic Environment			
SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	<p>SA 10.1: Does the Plan avoid adverse effects on the District's designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA 10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly at risk assets?</p> <p>SA 10.3: Does the Plan promote access to, as well as enjoyment and understanding of the local historic environment, for the District's residents and visitors?</p>	G1	Cultural Heritage
SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	<p>SA 11.1: Does the Plan protect the District's sensitive and special landscapes, seascapes and townscapes?</p> <p>SA 11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside, coastline and settlements?</p>	H1	Landscape, Cultural Heritage, Biodiversity and Flora and Fauna

## Chapter 4

# Sustainability Appraisal of Growth and Spatial Options

**4.1** Local Plan policies and site allocations should be selected and designed to support and deliver a preferred growth and spatial strategy. Therefore, Dover District Council's first priority in the development of its new Local Plan has been to identify and appraise a range of growth and spatial options:

- **Growth options** represent the range of potential scales of housing and economic growth that could be planned for over the Local Plan's lifespan (the Local Plan period).
- **Spatial options** represent the range of potential locational distributions for the various growth options over the Local Plan period.

**4.2** The consideration of options (or 'reasonable alternatives') is one of the most important parts of the SA process. The national Planning Practice Guidance states:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- Outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;
- As part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;
- Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.

**4.3** By appraising the reasonable alternative options the SA provides information about how different options perform in environmental, social and economic terms, which in turn can help the Council decide which option to pursue. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision. The SA Report must, however, communicate how these various factors, including the SA, have been taken into account in selecting the preferred growth and spatial strategy, and to demonstrate that the preferred approach is an appropriate strategy when compared to the alternatives.

**4.4** To demonstrate that an appropriate range of growth and spatial options has been considered, this chapter describes which options have been considered and which options are considered to be reasonable and unreasonable. The chapter then goes on to appraise the reasonable options against the SA framework, identifying each option's likely significant effects.

**4.5** The options presented and appraised were defined based on data and evidence available in July 2020 during the preparation of the Regulation 18 Draft Local Plan.

## Growth Option Considerations

**4.6** The Dover Local Plan must plan for a range of different types of development over the Plan period, but these types can be broadly categorised as meeting one of two fundamental local needs/aspirations:

- Housing.
- Employment opportunities.

**4.7** The need/aspiration to deliver housing and employment opportunities varies from place to place and over time based on a range of factors. The following factors are considered to be the key parameters in helping to define reasonable growth options:

- The minimum needs of the District.
- Aspirations to deliver growth above local District needs, either to deliver strategic aspirations or to accommodate shortfalls in neighbouring Plan areas.
- The District's capacity to deliver growth over the Local Plan period.

### Minimum housing need over the Plan period

**4.8** During the preparation of the Regulation 18 Draft Local Plan, the minimum requirement for housing need in the District was calculated using the standard methodology set out in national planning policy and associated practice guidance. In April 2020, this equated to a requirement for 596 dwellings per year, totalling 11,920 dwellings across the 20-year Plan period 2020 to 2040. A 10% buffer (1,192 dwellings) was added to this total to provide the necessary flexibility to ensure the District's minimum housing needs are delivered within the Plan period<sup>10</sup>.

**4.9** The District has a number of existing commitments which reduce the overall level of housing the Local Plan will need to plan for through site allocations and windfalls<sup>11</sup>. Commitments are sites with existing planning permission, both major and minor. As of 1<sup>st</sup> April 2020, during the preparation of the Draft Local Plan, there were 4,408 extant permissions.

**4.10** Taken together, the total residual housing requirement that the Draft Local Plan (Regulation 18) was found to need to deliver over the Plan period through the allocation of sites and windfall development was 8,704 dwellings (rounded down to 8,700).

**4.11** The SA of the District's growth options noted that the final housing target for the Local Plan was subject to change up until the methodology for calculating need was finalised towards the end of the plan-making process. During the preparation of the Regulation 19 Publication Local Plan, the minimum requirement for housing need in the District was calculated using the standard method in national planning guidance and baseline 2014-based household projections. In April 2022, this equated to a requirement for 611 dwellings per year, totalling 10,998 dwellings across the 18-year plan period 2022 to 2040. A contingency buffer (roughly 8.4%) increases the figure by 926 dwellings to 11,924 dwellings. Factoring in updated extant commitments recorded during the preparation of the Publication Local Plan (5,282 dwellings), the total residual housing requirement that the Publication Local Plan must plan for through the allocation of sites and windfall development is 5,716 dwellings. The significant effects of this lower scale of growth are appraised in **Chapter 7** through the SA of the Regulation 19 Publication Local Plan.

### Potential maximum capacity to deliver housing over the Plan period

**4.12** The NPPF places great emphasis on the delivery of homes where they are needed. However, if a Council can clearly and robustly demonstrate that it is unable to meet its own growth requirements, then it can come to an agreement with neighbouring council(s) under the Duty to Co-operate to meet some, or all, of its shortfall.

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<sup>10</sup> The 10% buffer is recommended through the District's Strategic Housing Market Assessment (SHMA, 2017) as an appropriate buffer level to ensure need is delivered.

<sup>11</sup> The term 'windfall sites' is used to refer to those sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's Local Plan. Over the last 10 years windfall development has made an important and sustained contribution to the provision of additional homes in this District, accounting for 45% of all completed dwellings within the District over this period. Over two thirds of these windfall developments have been new-build dwellings, with 85% of these coming forward on previously developed land. Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.

**4.13** Since the early stages of plan making, the Council's have had a Memorandum of Understanding (MOU) with other authorities in East Kent, including Thanet DC, Canterbury CC, Folkestone and Hythe DC and Ashford BC that agrees each authority will meet its own housing needs. The MOU was last updated in 2021.

**4.14** In the absence of any clear metric on how much additional housing growth Dover District wished, or was called upon to accommodate over the Plan period, the total capacity of the District's known suitable and potentially suitable housing sites was calculated. The District's draft Housing and Economic Land Availability Assessment (HELAA)<sup>12</sup> published in April 2020 identified 126 'suitable' or 'potentially suitable' sites (with capacity for 12,111 dwellings)<sup>13</sup>. Therefore, at the time of preparing the Draft Local Plan, Dover District Council could theoretically allocate up to 126 new/expanded sites with a total capacity to accommodate 12,111 dwellings. Factoring in the District's calculated allowance for windfall sites (1,190 dwellings), the District had a total theoretical capacity to deliver 13,301 dwellings over the Plan period.

**4.15** While the delivery of all 12,111 dwellings across all 126 sites may have proven difficult given past delivery rates and infrastructure constraints, this was not considered justification for discounting this level of housing growth at that stage.

**4.16** If this assessment were to be carried out now, the theoretical higher growth scenario would be lower because the number of suitable and potentially suitable sites (capacity for 10,880) has reduced during the preparation of the Publication Local Plan, following the consultation at draft Plan stage and further technical work being carried out.

**4.17** In October 2021, Dover District Council received a request from Elmbridge Borough Council to help accommodate some of the Borough's unmet housing need. At this point in time the availability of suitable and potentially suitable site had reduced significantly, and due to infrastructure, planning and other constraints the Council did not consider it was able to accommodate any additional housing need.

**4.18** At the Regulation 19 Publication Local plan stage, the District's housing need increased marginally from 596 to 611 dpa. However, due to increases in the extant supply the number of homes that needed to be identified through Local Plan allocations and windfall sites decreased from the position at the Regulation 18 Draft Local Plan stage. It was therefore not considered necessary to appraise any further options, as the full range of options had been appraised at the Draft Local Plan (Regulation 18) stage.

#### Minimum employment land need over the Plan period

**4.19** The adopted District Plan allocates approximately 227,450m<sup>2</sup> of employment floorspace for offices, research and development and light industrial processes (hereafter referred to as E use class)<sup>14</sup>; however, approximately, 98,756m<sup>2</sup> of this allocated employment land has yet to be taken-up and permitted for development. The District's Economic Development Needs Assessment (EDNA)<sup>15</sup> produced in 2017 at the start of the Local Plan review process estimated a total job growth of 2,700 jobs between 2017 and 2037. Translated into an E use class land area over the Local Plan period this equates to a negative requirement in allocated E use class floorspace of -1,680m<sup>2</sup>. However, the assessment concludes that this may not obviate the need for some new employment site allocations to meet qualitative needs, help support the economic regeneration of the District and also to reposition the current sites portfolio so it can more effectively support future delivery.

**4.20** During the preparation of this appraisal work the District was in the process of updating its economic development needs evidence to provide greater clarity on how best to recalibrate its current portfolio of employment site allocations. In the absence of the updated evidence at the time the options were being developed, it was considered reasonable to assume that a minimum employment land growth option would require no new employment land allocation and no significant deallocation, i.e. the allocated level of employment growth would be roughly the same as the adopted Local Plan.

**4.21** The updated Dover EDNA<sup>16</sup> published in 2021 to inform the Regulation 19 Publication Local Plan calculates a minimum employment land need of 48,925 m<sup>2</sup> using Experian data, but the assessment acknowledges the growth aspirations of the District and highlights that greater capacity would be needed to meet these aspirations. The significant effects of District's

<sup>12</sup> Dover Housing and Economic Land Availability Assessment, Dover District Council, 2020.

<sup>13</sup> The HELAA published at Regulation 18 stage identified capacity for 13,654 dwelling.

<sup>14</sup> The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 amend the Town and Country Planning (Use Classes) Order 1987 with the B1 business (office, research and development and light industrial process) Use Class being changed to the new Use Class E alongside shops, financial and professional services, medical or health services, indoor sport, recreation or fitness premises, education and public art, exhibition, legal and religious institutions. The reclassification came into force on the 1<sup>st</sup> September 2020.

<sup>15</sup> Dover Economic Development Needs Assessment, Lichfields, 2017.

<sup>16</sup> Dover Economic Development Needs Assessment Update, Lichfields (October 2021).

preferred scale of growth balancing supply, need and economic aspiration are appraised in **Chapter 7** through the SA of the Publication Local Plan (Regulation 19).

### Maximum capacity to deliver employment land over the Plan period

**4.22** For the same reasons outlined for housing above, Dover District Council did not rule out the possibility of planning for more employment growth than is currently needed locally.

**4.23** Again, in the absence of any clear metric on how much additional employment growth Dover District may wish or be called upon to accommodate, the total capacity of the District's known and suitable employment sites has been calculated. During the preparation of the Regulation 18 Draft Local Plan, the District's Employment Land Review (ELR) identified 4 'suitable' sites (94,688m<sup>2</sup>) and 9 'potentially suitable' sites (43,550m<sup>2</sup>). Therefore, the Local Plan was found to be able to theoretically allocate up to 13 new/expanded sites with a total capacity to accommodate 138,238m<sup>2</sup> of E use class employment land.

**4.24** Again, while the delivery of all 138,238m<sup>2</sup> may prove difficult given past delivery rates, this was not considered justification to discount this level of employment growth.

**4.25** The updated Dover EDNA<sup>17</sup> published in 2021 to inform the Publication Local Plan (Regulation 19) calculates an employment land potential of 117,290 m<sup>2</sup> projecting forward development trends over the last five years up to the end of the Plan period (2040). The assessment acknowledges the growth aspirations of the District and refers to this scale of growth as an indication of the scale of market potential for employment development, should a sufficient amount of land in the right place be made available for developers and business occupiers in the District. The significant effects of the District's preferred scale of growth balancing supply, need and economic aspiration are appraised in **Chapter 7** through the SA of the Publication Local Plan.

### Reasonable Growth Options

**4.26** In light of the above evidence and policy considerations during the preparation of the Regulation 18 Draft Local Plan, three potential scales of growth were identified for further consideration and appraisal:

- **Growth Option 1:** Lowest growth scenario – meeting the minimum objectively assessed needs of the District: 8,700 new homes and no new employment land.
- **Growth Option 2:** Medium growth scenario – meeting the minimum objectively assessed housing needs of the District (8,700 new homes) but also maximising the economic growth potential of the District by allocating all suitable and potentially suitable employment land (138,238m<sup>2</sup>).
- **Growth Option 3:** Highest growth scenario – maximising the residential and economic growth potential of the District by allocating all suitable and potentially suitable housing land (12,111 dwellings) and employment land (138,238m<sup>2</sup>).

**4.27** The further evidence published during the preparation of the Regulation 19 Publication Local Plan informed the final scale of growth planned for in the Publication Local Plan. The significant effects of this final scale of growth are appraised in **Chapter 7** through the SA of the Publication Local Plan.

### Growth Options Discounted as Unreasonable

**4.28** A comprehensive set of growth options has been identified for further consideration and appraisal. However, planning for scales of growth lower than calculated need have been discounted on the grounds of being contrary to national policy and guidance. This is because the District's Local Plan evidence base indicates that the District's calculated housing and employment land needs can be accommodated in accordance with the presumption in favour of sustainable development.

### Spatial Option Considerations

**4.29** The three scales of growth identified for further consideration and appraisal could be distributed across the District in many different ways. The identification and selection of spatial options for distributing development needs to be guided by:

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<sup>17</sup> Dover Economic Development Needs Assessment Update, Lichfields (October 2021).

- Compliance with national planning policy, as set out in the NPPF.
- The current distribution of development in the Plan area, such as where the main towns are, the main transport links, how urban or rural the plan area is, and the role and function of settlements within the plan area, and the relationship between them and with settlements in neighbouring authorities, particularly where these are of a large scale and influence.
- Development that is already planned, such as where planning consent has been granted but not yet implemented.
- The environmental assets and constraints in the Local Plan area, in order to ensure that the most important environmental assets are safeguarded, and where possible the environment is improved.
- The objectives of the Council, insofar as they relate to the Local Plan, such as ensuring there are enough of the right type of homes and employment land to meet people's needs, supporting economic development and jobs, addressing the needs of more disadvantaged communities, minimising carbon emissions and dealing with air quality issues that can affect human health.

**4.30** With these in mind, the Council carried out the following exercises:

- Review of existing plans and strategies at a national, regional and local level – including the existing growth strategy set out in the Core Strategy and Land Allocations Local Plan.
- Review of the existing evidence base to identify key issues to be addressed as part of the growth strategy.
- Review of existing environmental constraints – for example landscape designations, flood risk, historic assets etc.
- Initial stakeholder and community engagement workshops to discuss issues and opportunities to be addressed in the new Local Plan, and options to manage them.

**4.31** This led to the definition of five reasonable spatial options, set out and appraised below.

## Reasonable Spatial Options

**4.32** In light of the above evidence and policy considerations, five potential distributions of growth (i.e. the pattern and extent of growth in different locations) were identified during the preparation of the Regulation 18 Draft Local Plan:

- **Spatial Option A:** Distributing growth to the District's suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required<sup>18</sup>).
- **Spatial Option B:** Distributing growth proportionately amongst the District's existing settlements based on their population.
- **Spatial Option C:** Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- **Spatial Option D:** Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover town.
- **Spatial Option E:** Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

**4.33** The significant effects of the distribution of growth cannot be adequately determined without an accurate sense of its scale. It is therefore necessary to clearly understand how the growth options relate to and influence the spatial options before they are subject to SA.

**4.34** Spatial Option A (suitable sites) distributes growth based on the location of the District's identified suitable and potentially suitable HELAA and ELR sites:

- Growth Option 1 influences spatial option A in so far as it requires the allocation of the lowest number of sites, specifically the District's known housing sites found to be suitable in the District's HELAA.

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<sup>18</sup> Suitable sites prioritised over potentially suitable sites for growth option 1.



- Growth Option 2 influences spatial option A in so far as it requires the allocation of the District's known housing sites found to be suitable in the District's HELAA and the District's known employment sites found to be suitable or potentially suitable in the District's ELR.
- Growth Option 3 influences spatial option A in so far as it requires the allocation of the highest number of sites, specifically the District's known housing sites found to be suitable or potentially suitable in the District's HELAA and the District's known employment sites found to be suitable or potentially suitable in the District's ELR.

**4.35** The distribution of growth under spatial options B-E would remain unchanged for all three growth options (1-3), but the scale of growth in each settlement would vary. Relative to growth option 1 and 2, each settlement allocated growth under each spatial option would receive a 39.2% uplift in housing growth under growth option 3. Furthermore, growth options 2 and 3 allocate 138,238m<sup>2</sup> of additional employment land not required under growth option 1. These equal uplifts in growth between the five spatial options allows for a fair comparison to be made between the effects of spatial option A (distributed based on the location and capacity of known sites) and the other spatial options (B-E) through the SA process.

**4.36** Further details of the relationship between the growth and spatial options and how they have been appraised is provided below.

**4.37** The significant effects of the final distribution of growth is appraised in **Chapter 7** through the SA of the Regulation 19 Publication Local Plan.

#### Spatial Option A (suitable sites)

**4.38** Spatial Option A distributes development to the locations where site options had been promoted and found to be suitable or potentially suitable through the District's HELAA and ELR during the preparation of the Regulation 18 Draft Local Plan. The greater the scale of growth to be delivered, the greater the number of sites that needed to be allocated.

**4.39** To meet the District's minimum housing need over the Plan period (required under Growth Options 1 and 2) at the time the options were developed, sites able to accommodate an additional 8,700 dwellings needed to be allocated. The capacity of the sites found to be suitable through the District's HELAA during the preparation of the Draft Local Plan (Regulation 18) equalled 8,948 dwellings, just enough to meet the District's minimum additional allocation needs and therefore used for this option to avoid discounting sites. These sites were distributed as follows:

- 76% of the sites were located in and around Dover.
- 5% of the sites were located in and around Deal.
- 2% of the sites were located in and around Sandwich.
- Less than 1% is recorded on sites in and around Aylesham.
- The remaining 17% of the sites were distributed amongst the District's many rural villages, notably (only percentages over 1% noted):
  - Alkham.
  - 1% to Ash.
  - 1% to Capel-le-Ferne.
  - 1% to Eastry.
  - 5% to Eythorne.
  - Goodnestone.
  - West Hougham.
  - East Langdon.
  - 1% to Lydden.
  - 1% to Nonnington.
  - Northbourne.
  - 1% to Preston.
  - 2% to Ringwould.
  - Shepherdswell.
  - 1% to St Margaret's.
  - 1% to Staple.
  - East Studdal.

- Tilmanstone.
- 1% to Wingham.
- Woodnesborough.
- 1% to Worth.

**4.40** Growth Option 3 aims to maximise the District's capacity to deliver homes. The total capacity of the promoted housing sites found to be suitable and potentially suitable through the District's HELAA equals 12,111 dwellings. These sites were distributed as follows:

- 56% of the sites were located in and around Dover.
- 5% of the sites were located in and around Deal.
- 4% of the sites were located in and around Sandwich.
- 10% of the sites were located in and around Aylesham.
- The remaining 25% of the sites were distributed amongst the District's many rural villages, notably (only percentages over 1% noted):
  - Alkham.
  - 3% to Ash.
  - 1% to Capel-le-Ferne.
  - 1% to Eastry.
  - 6% to Eythorne.
  - Goodnestone.
  - West Hougham.
  - 1% to Kingsdown.
  - East Langdon.
  - 1% to Lydden.
  - Nonnington.
  - 3% to Northbourne.
  - 1% to Preston.
  - 1% to Ringwould.
  - 2% to Shepherdswell.
  - 1% to St Margaret's.
  - 1% to Staple.
  - East Studdal.
  - Tilmanstone.
  - 1% to Wingham.
  - Woodnesborough.
  - Worth.

**4.41** Growth Options 2 and 3 aim to maximise the District's capacity to deliver economic growth. The total capacity of the promoted employment sites found to be suitable and potentially suitable during the preparation of the Draft Local Plan (Regulation 18) through the District's ELR equalled 138,238m<sup>2</sup> of employment land. These sites were distributed as follows:

- 68% of the sites, able to accommodate roughly 94,506m<sup>2</sup> of employment land, were located in and around Dover.
- 4% of the sites, able to accommodate roughly 5,832m<sup>2</sup>, were located in and around Sandwich.
- 24% of the sites, able to accommodate roughly 33,500m<sup>2</sup>, were located in and around Aylesham.
- 2% of the sites, able to accommodate roughly 2,600m<sup>2</sup>, were located in and around Eastry.
- 1% of the sites, able to accommodate roughly 1,800m<sup>2</sup>, were located in and around Ringwould.

**4.42** Given the past development rates at the Whitfield urban extension and the Dover town area, the deliverability of all the development in and around Dover town is likely to be challenging. However, the uncertainty around delivery is not considered to be enough to discount the option from consideration in the plan-making process.

### Spatial Option B (population based)

**4.43** Spatial Option B distributes the growth options proportionately amongst the District's existing settlements based on their population. Census data from 2011<sup>19</sup> has been used to determine the populations of the District's parishes. Where there is more than one village in a parish, growth has been distributed evenly between them, unless one of the villages is much larger with more services. Where this is the case, development has been distributed only to the largest village.

**4.44** This spatial strategy would distribute the District's housing and employment growth needs/aspirations as follows regardless of the scale and type of growth required:

- 38% to Dover.
- 28% to Deal.
- 5% to Sandwich.
- 4% to Aylesham.
- 25% to the Districts rural villages (only percentages over 1% noted):
  - Alkham.
  - 3% to Ash.
  - Ashley.
  - Barnsole.
  - 2% to Capel-le-Ferne.
  - Denton with Wooton.
  - 2% to Eastry.
  - 1% to Eythorne.
  - 1% to Elvington.
  - Goodnestone.
  - West Hougham.
  - Kingsdown.
  - East Langdon.
  - Lydden.
  - Nonnington.
  - Northbourne.
  - Preston.
  - Ringwould.
  - Ripple.
  - 2% to Shepherdswell.
  - 2% to St Margaret's.
  - East Stourmouth.
  - Staple.
  - East Studdal.
  - Tilmanstone.
  - 2% to Wingham.
  - Woodnesborough.
  - Worth.

### Spatial Option C (settlement hierarchy)

**4.45** Spatial Option C distributes the growth options proportionately amongst the District's existing settlements based on their position in the District's Settlement Hierarchy (at the time of the assessment) . The higher a settlement is on the District's settlement hierarchy the more sustainable it is considered to be in terms of the range of its existing services and facilities, and its access to those services by public transport. Therefore, greater proportions of growth are reserved for the settlements higher up the hierarchy. Conversely, no development is proposed in the settlements with very limited services.

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<sup>19</sup> This dataset is the most accurate record of the distribution of the District's population at the time of the SA of the spatial options. However, it is noted that the 2011 Census data does not pick up on the population growth that has taken place at Aylesham since 2011.

**4.46** This spatial strategy would distribute the District's housing and employment growth needs/aspirations as follows, regardless of the scale and type of growth required:

- 45% to Dover.
- 20% to Deal.
- 15% to Sandwich.
- 10% to Aylesham.
- 10% to the Districts rural villages (no villages would receive over 1% of the total growth):
  - Alkham.
  - Ash.
  - Barnsole.
  - Little Betteshanger.
  - Chillenden.
  - Capel-le-Ferne.
  - Denton with Wooton.
  - Eastry.
  - Eythorne.
  - Finglesham.
  - Goodnestone.
  - West Hougham.
  - Kingsdown.
  - East Langdon.
  - Lydden.
  - Martin.
  - Martin Mill.
  - Nonnington.
  - Northbourne.
  - Preston.
  - Ringwould.
  - Ripple.
  - Shepherdswell.
  - St Margaret's.
  - East Stourmouth.
  - Tilmanstone.
  - Wingham.
  - Wingham Green.
  - Woodnesborough.
  - Worth.

#### **Spatial Option D (adopted plan Dover focus)**

**4.47** Spatial Option D distributes the growth options in the same way as the spatial strategy set out in the adopted Core Strategy. The adopted Core Strategy focussed the vast majority of the District's growth in and around Dover town, with the remainder being split across Deal, Sandwich, Aylesham, and the higher tier settlements in the rural area.

**4.48** The split of development across the rural settlements has been taken from the allocations set out in the District's adopted Site Allocations Documents which supports the delivery of the adopted Core Strategy.

**4.49** This option would require the majority of the large Whitfield urban extension north of Dover (5,750 dwellings) to come forward within the Local Plan period. Given the past development rates at the Whitfield urban extension, the deliverability of all the development in and around Dover town is likely to be difficult. However, the uncertainty around delivery is not considered to be enough to discount the option from the plan-making process.

**4.50** This spatial strategy would distribute the District's housing and employment growth needs/aspirations as follows regardless of the scale and type of growth required:

- 70% to Dover.
- 10% to Deal.
- 5% to Sandwich.
- 7% to Aylesham.
- 8% to the Districts rural villages (only percentages over 1% noted):
  - 2% to Ash.
  - Capel-le-Ferne.
  - 2% to Eastry.
  - Eythorne.
  - Kingsdown.
  - East Langdon.
  - Lydden.
  - Nonnington.
  - Shepherdswell.
  - St Margaret’s.
  - East Studdal.
  - Woodnesborough.
  - Worth.

#### Spatial Option E (more even settlement focus)

**4.51** Spatial Option E is focussed on distributing the growth options more evenly between the District’s settlements, concentrating less growth in and around Dover town and more in and around Deal, Sandwich, Aylesham and the rural villages.

**4.52** The growth redistributed away from Dover is roughly equivalent to outstanding housing provision allocated to the Whitfield urban extension, which has in the past been slow to deliver. Appraising this spatial option offers an insight into the likely effects of deallocating a potentially ‘undeliverable’ Whitfield urban extension and reallocating its growth elsewhere within the District where development is proving to be more deliverable.

**4.53** The redistribution of growth to Deal, Sandwich, Aylesham and the rural settlements relates to their relative positions in the District’s Settlement Hierarchy.

**4.54** This spatial strategy would distribute the District’s housing and employment growth needs/aspirations as follows regardless of the scale and type of growth required:

- 20% to Dover.
- 30% to Deal.
- 20% to Sandwich.
- 15% to Aylesham.
- 15% to the Districts rural villages (only percentages over 1% noted):
  - Alkham.
  - 1% to Ash.
  - Barnsole.
  - Little Betteshanger.
  - Chillenden.
  - Capel-le-Ferne.
  - Denton with Wooton.
  - 1% to Eastry.
  - Eythorne.
  - Finglesham.
  - Goodnestone.
  - West Hougham.
  - Kingsdown.
  - East Langdon.
  - Lydden.

- Martin.
- Martin Mill.
- Nonnington.
- Northbourne.
- Preston.
- Ringwould.
- Ripple.
- 1% to Shepherdswell.
- 1% to St Margaret's.
- East Stourmouth.
- Tilmanstone.
- 1% to Wingham.
- Wingham Green.
- Woodnesborough.
- Worth.

### Spatial Options Discounted as Unreasonable

**4.55** Spatial options including the allocation of a new settlement were raised and discussed during the Council's early Local Plan workshops. Options to allocate a new settlement in the Local Plan were discounted for the following reasons:

- The Council has enough suitable and potentially suitable promoted site options to meet needs and aspirations of the Local Plan period, without the need for a new settlement.
- No sites have been promoted through the Council's 'call for sites' exercises as new settlement proposals.
- In the absence of suitable new settlement site options, the process of identifying reasonable and sustainable locations for a new settlement, contacting landowners etc., is time consuming and resource intensive. Proceeding with such an option would require a considerable amount of specialist evidence, such as a detailed growth options study, and a longer plan programme. This could pose a risk in terms of speculative planning applications and the determination of appeals.
- The allocated Whitfield Urban Extension is of a scale large enough to be described as a new settlement. Delivering other allocations at this scale within the Plan period would limit the range and choice of homes available, as well as limit the ability of the Plan to deliver homes in the short to medium term.

**4.56** Consideration of the need for a new settlement will be explored in more detail when planning for the next Plan period.

### Approach to the SA of the Growth and Spatial Options

**4.57** A Local Plan must determine both the strategic scale and distribution of growth. As the distribution of growth, i.e. its pattern and extent, cannot be determined without an accurate sense of its scale, neither concept can be considered or appraised in isolation. It is therefore necessary to appraise all potential combinations of the reasonable scales and distributions of growth identified above.

**4.58** The full range of reasonable growth and spatial options identified during the preparation of the Draft Local Plan (Regulation 18) and how they relate to one another is set out in **Table 4.1**. There are 15 combined growth/spatial options in total.

**4.59** Each of the 15 combined growth and spatial options has been appraised against each of the SA objectives in the SA framework. The options are high level, strategic options, and the SA has been undertaken at a similarly high level, drawing upon the SA baseline. The purpose was not to identify site-specific detailed effects, but to draw out the broad variations in effects to enable comparisons to be made between the options.

**4.60** The likely effects of the 15 options are presented by SA objective. The SA of each option against each SA objective was carried out in the same way, for consistency and clarity. The appraisal commentary exploring the likely significant effects of each option can be found in Appendix C of the SA Report that accompanied the Draft Local Plan during the Regulation 18 consultation in early 2021. The appraisal commentary in this appendix is followed by **Figures C.1 to C.15**, which illustrate the variations in the scale and spatial distribution of growth across the District and map the District's existing pattern of settlements,

strategic services and facilities and environmental assets and constraints. The information illustrated on these maps highlighted the main sustainability and strategic planning issues considered in the SA of the 15 options.

**4.61** These maps were supplemented by:

- Nomis data, provided by the Office for National Statistics, which gives access to the most detailed and up-to-date UK labour market statistics from official sources; and
- DataShine data, which is an output of the ESRC BODMAS project which ran from 2013-2015 at UCL and uses 2011 Census data.

**4.62** Together these two datasets offered an insight into how the District's residents and workers commute into and out of the District. In summary, the District experiences net out-commuting overall, particularly in the north and west of the District into neighbouring Canterbury and Folkestone and Hythe, respectively, although significant numbers of residents in these neighbouring areas also commute into Dover. The District also has a strong relationship with the Districts of Ashford and Thanet to the west and north. Dover and Sandwich attract the greatest numbers of commuters. Relative to Dover and Sandwich, Deal attracts lower numbers of commuters, generally from its immediate vicinity, specifically Kingsdown with Ringwould, Eythorne and to a lesser extent Aylesham and Ash.

**4.63** Given the high-level nature of the options, the precise location of growth within each of the options, including options 1a, 2a and 3a which draw on the locations of specific HELAA site options, has not been specified. Consequently, a precautionary approach has been taken to identifying likely adverse effects on known environmental constraints/assets within and in the immediate vicinity of settlements and sites. However, where appropriate, the SA has highlighted where there are broad opportunities to avoid significant adverse effects on environmental constraints/assets without compromising the delivery of the scale and distribution of growth options being tested.

**4.64** The remainder of this chapter summarises the judgements drawn out in Appendix C of the SA Report that accompanied the Draft Local Plan Regulation 18 consultation. The summary is organised by SA objective, comparing the effects of each option. It should be noted that the 15 options are not mutually exclusive but are designed to draw out the sustainability pros and cons of the different scales and distributions of growth across the District. The preferred option could be a combination of two or more of the options tested. The chapter ends with a summary of all the effects identified in the SA of the 15 options, as illustrated in **Table 4.2**.

**Table 4.1: Combined growth and spatial options tested through SA during the preparation of the Draft Local Plan**

Growth Options 1-3 / Spatial Options A-E	Growth Option 1: Lowest growth scenario – meeting the minimum objectively assessed needs of the District	Growth Option 2: Medium growth scenario – meeting the minimum objectively assessed housing needs of the District and maximising the economic growth potential of the District	Growth Option 3: Highest growth scenario – maximising the residential and economic growth potential of the District
Spatial Option A: Distributing growth to the District’s suitable and potentially suitable housing and employment site options (as needed to deliver the scale of growth required).	8,948 <sup>20</sup> dwellings distributed by the location of the District’s suitable HELAA sites.	8,948 dwellings + 138,238m <sup>2</sup> of employment land distributed by the location of the District’s suitable HELAA sites and suitable and potentially suitable ELR sites.	12,111 dwellings + 138,238m <sup>2</sup> of employment land distributed by the location of the District’s suitable and potentially suitable HELAA and ELR sites.
Spatial Option B: Distributing growth proportionately amongst the District’s existing settlements based on their population.	8,700 dwellings distributed by each existing settlement’s population.	8,700 dwellings + 138,238m <sup>2</sup> of employment growth distributed by each existing settlement’s population.	12,111 dwellings + 138,238m <sup>2</sup> of employment growth distributed by each existing settlement’s population.
Spatial Option C: Distributing growth proportionately amongst the District’s existing settlements based on the District’s defined Settlement Hierarchy.	8,700 dwellings distributed by the District’s Settlement Hierarchy.	8,700 dwellings + 138,238m <sup>2</sup> of employment growth distributed by the District’s Settlement Hierarchy.	12,111 dwellings + 138,238m <sup>2</sup> of employment growth distributed by the District’s Settlement Hierarchy.
Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.	8,700 dwellings distributed consistently with the adopted spatial strategy.	8,700 dwellings + 138,238m <sup>2</sup> of employment growth distributed consistently with the adopted spatial strategy.	12,111 dwellings + 138,238m <sup>2</sup> of employment growth distributed consistently with the adopted spatial strategy.
Spatial Option E: Distributing growth more equally across the District’s settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.	8,700 dwellings distributed more evenly across the District’s settlements: Dover, Deal, Sandwich, Aylesham, and the rural villages.	8,700 dwellings + 138,238m <sup>2</sup> of employment growth distributed more evenly across the District’s settlements: Dover, Deal, Sandwich and Aylesham, and the rural villages.	12,111 dwellings + 138,238m <sup>2</sup> of employment growth distributed more evenly across the District’s settlements: Dover, Deal, Sandwich and Aylesham, and the rural villages.

<sup>20</sup> It is noted that the Options 1a and 2a have slightly higher dwelling numbers than the other options under their respective growth columns. This is because options 1a and 2a quote the total capacity of the District’s suitable HELAA sites at the time of preparing the Draft Local Plan (8,949 dwellings), while the other options under these two growth scenarios reference the District’s rough housing need (8,700 dwellings) in 2020. All the options under growth 1 and 2 have been appraised under the assumption that they will meet the minimum housing needs of the District. Furthermore, the relatively minor difference in total dwelling numbers is not considered to affect the overall findings of the SA against any SA objective at this early high-level stage in the process. The District’s housing and employment needs have been refined during the preparation of the Publication Local Plan. Notable changes to the Council’s preferred scale and distribution of growth are appraised in Chapter 7, following initial consultation of the draft approach set out in Chapter 6.



## SA findings by SA objective

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	++/--	++/-	++/-	++/--	++/-
Growth Option 2: Medium Growth	++/--	++/-	++/-	++/--	++/-
Growth Option 3: Highest Growth	++/-	++/-	++/-	++/--	++/-
Key					
++/-			++/--		
Mixed significant positive and minor negative effect likely			Mixed significant effect likely		

**4.65** All options would result in the delivery of housing to help meet the requirements of the Plan period. All options taking forward Growth Option 1 (lowest growth) and 2 (medium growth) would deliver a level of housing development which could meet Dover's assessed need over the Plan period. This would include a 10% buffer so that flexibility of supply is achieved in the case of some allocated sites not being delivered as envisaged. Growth Option 3 (highest growth) would deliver more homes than needed, potentially contributing to neighbouring needs or investment in other parts of the District. Therefore, significant positive effects are expected for all options in relation to SA objective 1 (housing).

**4.66** House prices across the District are higher than the national average. The north of the District, including the settlement of Sandwich, represents the most expensive part of Dover District, while Dover town and the south are the cheapest. Furthermore, the IMD 2019 reports that all of these settlements, as well as Aylesham, contain areas graded against the 'Barriers to Housing and Services Domain' (which considers access to housing through measures such as affordability and homelessness) as within the 10% most deprived in England.

**4.67** Providing new housing in areas of the District where house prices are currently highest would respond positively to areas of highest demand. Provision of housing at these locations would also help to address affordability by increasing housing choice and providing new affordable homes.

**4.68** It is expected that the provision of housing at larger sites, most likely through urban extensions in the case of Dover District, will provide most opportunities for the delivery of higher numbers of affordable dwellings. All spatial options would allow for a level of development at the larger settlements which could support at least one new urban extension. Therefore, there is potential to secure new affordable homes through all options.

#### SA objective 1 conclusions

**4.69** The options that perform best against SA objective 1 are those that deliver the greatest number of homes within the Plan period and distribute it relatively evenly across the District to address the need for affordable housing in all settlements, i.e. distributing Growth Option 3 (highest growth) using Spatial Options B (population based) or C (settlement hierarchy), or a combination of the two.

**4.70** The options that perform the least well against SA objective 2 are those that deliver the least number of homes within the Plan period and distribute it most unevenly so as only to address affordable housing needs in specific parts of the District, i.e.

distributing Growth Option 1 (lowest growth) using Spatial Options A (suitable sites) or D (adopted Plan Dover focus), or a combination of the two.

**SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	++/--	--/+	++/-	++/-	--/+
Growth Option 2: Medium Growth	++/--	++/--	++/-	++/-	--/+
Growth Option 3: Highest Growth	++/--	++/--	++/-	++/-	--/+
<b>Key</b>					
++/- Mixed significant positive and minor negative effect likely		++/-- Mixed significant effect likely		--/+ Mixed significant negative and minor positive effect likely	

**4.71** The highest concentration of services and facilities in the District is provided in and around Dover town. This includes a number of higher learning facilities, access to which is limited elsewhere in the District. Deal benefits from the second strongest service offer in the District, with Sandwich and Aylesham also providing access to a range of services and facilities. Aylesham is notable in that it does not provide access to a secondary school. The railway services in the District link Sandwich, Deal and Dover, as well as Dover to Aylesham and Canterbury outside of the District.

**4.72** Areas of deprivation in the District, as indicated by the findings of the IMD 2019, are most notable within the settlement of Dover, with Aylesham also identified as containing some areas of higher deprivation. Dover contains two AQMAs. Land to the north of the District within Thanet also lies within an AQMA. Areas identified as being affected by the highest levels of noise pollution lie along the strategic road network in the Plan area. Most notably these are along the M20/A20 and A2 in and around Dover as well as the A256 and A258 which travel out of this area to the north towards Sandwich and Deal. There are also high amounts of noise pollution experienced along the A257 between Sandwich and Ash, and towards Wingham. Noise pollution will also be experienced along the railway lines in the District. Subsidence and pollution can result from mine entries in the Plan area; however, the District's mine entries are mostly located in rural areas away from the vast majority of people. The exception to this is one mine entry towards the northern edge of the village of Lydden, where all options would place a relatively small amount of development.

**SA objective 2 conclusions**

**4.73** The options that perform best against SA objective 2 are those that deliver growth in closest proximity to the District's settlements with the greatest range of accessible local services and facilities. The settlements also tend to be the locations where there is the greatest opportunity to address deprivation in the District and encourage more active lifestyles. Furthermore, the less significant the scale and more even the spread of growth amongst these sustainable service centres the less likely growth will generate significant adverse effects on the health and well-being of local residents and workers. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Option C (settlement hierarchy) is considered to be the best performing option against SA objective 2.

**4.74** The options that perform the least well against SA objective 2 are those that deliver growth farthest away for the established centres, making it harder for new residents and workers to access services and facilities and take advantage of

more active healthy modes of transport, as well as sport and recreation. The greater the scale of growth in these spatial options the greater the likelihood that local residents and workers' health and well-being will be affected adversely. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 2.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--/+	--/+	++/-	++/--	--/+
Growth Option 2: Medium Growth	++/--	++/--	++/-	++/-	--/+
Growth Option 3: Highest Growth	++/--	++/--	++/-	++/-	--/+
Key					
++/- Mixed significant positive and minor negative effect likely		++/-- Mixed significant effect likely		--/+ Mixed significant negative and minor positive effect likely	

**4.75** The settlements of Dover and Sandwich<sup>21</sup> experience the highest level of inward commuting in the District. Dover, Sandwich and Aylesham contain the highest number of employment sites. Considering the relatively large size of Deal, this settlement provides access to a relatively limited number of job opportunities, with many residents commuting to other settlements such as Sandwich, in addition to locations outside of the District. Dover is the largest centre in the Plan area and provides strongest access to services and facilities, which also offer employment opportunities. The diverse range of services in Dover town makes it a particularly attractive location for businesses.

#### SA objective 3 conclusions

**4.76** The options that perform best against SA objective 3 are those that deliver the greatest scale and variety of employment opportunities within the Plan period and distribute it relatively evenly, including in established and accessible settlements across the District, i.e. distributing Growth Options 2 (medium growth) and 3 (highest growth) using Spatial Options C (settlement hierarchy) and D (adopted Plan Dover focus), or a combination of the two.

**4.77** The options that perform the least well against SA objective 3 are those that deliver the least employment opportunities and distribute housing growth the farthest away from the District's established commercial centres, increasing average commuting times, i.e. distributing Growth Option 1 (lowest growth) using Spatial Option E (more even settlement focus).

<sup>21</sup> Sandwich's relatively high level of commuting is due to its close proximity to Discovery Park – the premier employment site in the District.

**SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--/+	--/+	++/-	++/--	--/+
Growth Option 2: Medium Growth	++/--	--/+	++/-	++/--	--/+
Growth Option 3: Highest Growth	--/+	--/+	++/--?	++/--	--/+
Key					
++/- Mixed significant positive and minor negative effect likely		++/-- Mixed significant effect likely		--/+ Mixed significant negative and minor positive effect likely	

**4.78** Any sizeable delivery of new homes in Dover District is likely to result in an increase in the number of journeys being made locally. Travel in the plan area, including the potential uptake of more sustainable and active modes of transport, will be influenced by the accessibility of public transport nodes as well as services and facilities and employment opportunities. Where new development provides easy access to these things, it is more likely that there will be a reduced need to travel and reliance on private vehicles in the District will decrease. While the Plan may help to encourage home working, through the provision of suitable infrastructure such as high speed broadband and more flexible live-work spaces, this will be dependent upon the specific design of development to be delivered and not the expected location of development.

**4.79** The District's Strategic Housing Market Assessment (SHMA) concludes that there is sufficient existing labour to meet the District's minimum economic growth needs. Consequently, significant increases in the local population would likely result in significant increases in out-commuting without the creation new strategic job opportunities, increasing the potential for road congestion.

**SA objective 4 conclusions**

**4.80** The options that perform best against SA objective 4 are those that deliver growth in closest proximity to the District's settlements with sustainable transport links and the greatest range of accessible local services and job opportunities. Furthermore, the less significant the scale and more even the spread of growth amongst these accessible service centres the less likely growth will generate significant amounts of road congestion. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Options C (settlement hierarchy) is considered to be the best performing option against SA objective 4.

**4.81** The options that perform the least well against SA objective 4 are those that deliver growth farthest away from the established centres, making it harder for new residents and workers to access services and facilities via sustainable modes of transport. The greater the scale and more unevenly spread growth is the greater the number and need for private vehicles, increasing congestion. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 4.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--	--	--	--	--
Growth Option 2: Medium Growth	--	--	--	--	--
Growth Option 3: Highest Growth	--	--	--	--	--
<b>Key</b>					
-- Significant negative effect likely					

**4.82** The District is covered by a number of water Source Protection Zones (SPZs) covering the District north of Dover to Deal and Shepherdswell, and south of Ash covering Aylesham and Wingham. The sewerage network at the area around Whitfield to the north of Dover has been identified as potentially being susceptible to becoming overcapacity, although work is underway to try to resolve this. There are also areas within the District which are covered by Mineral Safeguarding Areas (MSAs), most notably areas of brickearth to the south and west of Sandwich and in between Deal and Aylesham. Finally, a significant portion of the northern half of the District's open agricultural land is designated as Grade I and II, with the Grade II land continuing southwards into an area of wider Grade III agricultural land.

**SA objective 5 conclusions**

**4.83** The options are considered to generate relatively similar significant adverse effects against SA objective 5. All spatial distributions of growth tested would likely result in the significant development of greenfield land. Given the comprehensive spread of strategically important natural resources across the District, all options are likely to result in the potential significant loss of some of the District's best and most versatile agricultural land, mineral resources and/or potentially compromise the quality of groundwater reserves.

**4.84** The lower the scale of growth the less extensive the loss of such resources. Therefore, the lowest growth scenario (Growth Option 1) delivered under each spatial option are considered to perform the best and the highest growth scenarios (Growth Option 3) the least.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--/+	+/-	++/-	++/--	--/+
Growth Option 2: Medium Growth	--/+	+/-	++/-	++/--	--/+
Growth Option 3: Highest Growth	--/+	--/+	++/--	++/--	--/+
<b>Key</b>					
++/- Mixed significant positive and minor negative effect likely		+/- or ++/-- Mixed minor or significant effect likely		--/+ Mixed significant negative and minor positive effect likely	

**4.85** There are two AQMAs in the District, both of which lie within Dover town. There is also an AQMA to the north of the District within Thanet. The distribution of growth in the District will significantly influence the need to travel and encourage a modal shift. It is likely that providing residents with ease of access to services and facilities, employment opportunities and public transport links, will help to lower the need for private car use and improve the air quality within the immediate vicinity of the strategic road network.

**4.86** The District's Strategic Housing Market Assessment (SHMA) concludes that there is sufficient existing labour to meet the District's minimum economic growth needs. Consequently, significant increases in the local population would likely result in significant increases in out-commuting without the creation new strategic job opportunities, increasing the potential for road traffic and associated air pollution.

**SA objective 6 conclusions**

**4.87** The options that perform best against SA objective 6 are those that deliver growth in closest proximity to the District's settlements with sustainable transport links and the greatest range of accessible local services and job opportunities, and the farthest away from known areas of poor air quality. Furthermore, the less significant the scale and more even the spread of growth amongst these accessible service centres the less likely growth will generate significant amounts of road congestion. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Options C (settlement hierarchy) is considered to be the best performing option against SA objective 6.

**4.88** The options that perform the least well against SA objective 6 are those that deliver growth farthest away for the established centres, making it harder for new residents and workers to access services and facilities via sustainable modes of transport. The greater the scale and more unevenly spread growth, the greater the number and need for private vehicles, increasing congestion. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 6.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--?	--	--	-?	--
Growth Option 2: Medium Growth	--?	--	--	-?	--
Growth Option 3: Highest Growth	--?	--	--	-?	--
<b>Key</b>					
-- Significant negative effect likely			- Minor negative effect likely		

**4.89** The District does contain some significant areas of flood risk, most notably to the north and east of Deal and Sandwich in the north eastern corner of the District. Flood risk is generally driven by the District's coastal location, but also from the River Dour and River Stour to a lesser extent, at Dover and Sandwich, respectively. The land surrounding the tributaries to these rivers are also vulnerable to surface water flooding, the risk of which is generally more evenly spread across the District.

**4.90** Beyond locating development away from areas increasingly affected by flood risk, climate change adaptation can be effectively achieved through design measures. This may include more appropriate building orientation and use of more appropriate building materials to reduce heating and cooling demand, as well as the incorporation of water management solutions and green infrastructure into strategic developments.

**SA objective 7 conclusions**

**4.91** The options that perform best against SA objective 7 are those that focus growth around Dover town where there is greater opportunity to maximise the potential of brownfield land, avoid the development of significant areas of greenfield land and avoid the areas of significant flood risk in the north east of the District. The lower the scale of growth the lower the need to develop greenfield land. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Option D (adopted Plan Dover focus) is considered to be the best performing option against SA objective 7.

**4.92** The options that perform the least well against SA objective 7 are those that deliver growth in the north east of the District, closer to the most significant areas of flood risk, as well as allocate more land in the more rural settlements where there is greater potential for the loss of greenfield land. The greater the scale of growth, the greater extent of potentially impermeable urban surfaces across the District. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 7.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--/+	--/+	++/-	++/-	--/+
Growth Option 2: Medium Growth	++/--	--/+	++/-	++/-	--/+
Growth Option 3: Highest Growth	--/+	--/+	++/--	++/--	--/+
<b>Key</b>					
++/- Mixed significant positive and minor negative effect likely		++/-- Mixed significant effect likely		--/+ Mixed significant negative and minor positive effect likely	

**4.93** Delivering new homes in Dover District over the Plan period is likely to increase the number of journeys made regularly in the area as dwellings are constructed and occupied. The scale and distribution of growth dictated by the Local Plan will influence carbon emission generated by residents' and workers' need to use private vehicles, in particular. The potential uptake of more sustainable and active modes of transport, will help to mitigate private vehicle use in the Plan area and this will be influenced by the accessibility of public transport nodes, as well as services and facilities and employment opportunities. New development which provides easy access to these types of provisions is more likely to reduce new residents' need to travel and their reliance on private vehicles. Climate change mitigation will also be influenced by the potential to promote energy use from renewable and low energy sources.

**4.94** The Plan may help to encourage home working and uptake of low carbon vehicles. Encouraging changes of this nature are most likely to be influenced by the provision of suitable infrastructure such as high speed broadband and electric vehicle charging points, which will be dependent upon the specific design of development to be delivered and not the expected location of development.

**SA objective 8 conclusions**

**4.95** The options that perform best against SA objective 8 are those that deliver growth in closest proximity to the District's settlements with sustainable transport links and the greatest range of accessible local services and job opportunities. Furthermore, the less significant the scale and more even the spread of growth amongst these accessible service centres, the less likely growth will generate significant amounts of polluting traffic. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Options C (settlement hierarchy) is considered to be the best performing option against SA objective 8.

**4.96** The options that perform the least well against SA objective 8 are those that deliver growth farthest away for the established centres, making it harder for new residents and workers to access services and facilities via sustainable modes of transport. The greater the scale and more unevenly spread growth is the greater the number and need for private vehicles, increasing carbon emissions. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 8.



**SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--?	--	--	--?	--
Growth Option 2: Medium Growth	--?	--	--	--?	--
Growth Option 3: Highest Growth	--	--	--	--	--
<b>Key</b>					
-- Significant negative effect likely					

**4.97** The District contains a number of internationally and nationally designated biodiversity sites. Much of the land to the north east, south east and east of Sandwich is constrained by the presence of Thanet Coast and Sandwich Bay Ramsar site and SPA as well as Sandwich Bay SAC. These sites also act to constrain much of the land to the north and north west of Deal. Stodmarsh SSSI, SAC, SPA and Ramsar lies immediately to the north west of the District in neighbouring Canterbury.

**4.98** Dover town is less constrained than these settlements. However, areas of the coast to the south east of the settlement fall within Dover to Kingsdown Cliffs SAC and to the south west fall within Folkestone Warren SSSI. Furthermore, Lydden and Temple Ewell Downs SSSI and SAC, Lydden Temple Ewell NNR and Alkham, Lydden and Swingfield Woods SSSI all lie within close proximity of the existing settlement boundary of Dover farther north.

**SA objective 9 conclusions**

**4.99** All options are considered to have the potential to generate significant negative effects against SA objective 9.

**4.100** The options that perform best against SA objective 9 are those that focus growth in the south west of the District where there is greater opportunity to maximise the development of brownfield land in Dover town and avoid the majority of ecological assets in the District. The lower the scale of growth, the lower the need to develop greenfield land with the potential for ecological value. Therefore, distributing Growth Option 1 (lowest growth) using Spatial Option A (suitable sites) or D (adopted Plan Dover focus), or a combination of the two, are considered to be the best performing options against SA objective 9.

**4.101** The options that perform the least well against SA objective 9 are those that deliver the most growth in the north of the District in the immediate hydrological and recreational catchment of Thanet Coast and Sandwich Bay Ramsar site and SPA, Sandwich Bay SAC and Stodmarsh SSSI, SAC, SPA and Ramsar. The greater the scale of growth the greater likely loss of greenfield land and valuable ecological habitats, as well as the disruption of protected species. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 9.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--?	--?	--?	--?	--?
Growth Option 2: Medium Growth	--?	--?	--?	--?	--?
Growth Option 3: Highest Growth	--?	--?	--?	--?	--?
<b>Key</b>					
-- Significant negative effect likely					

**4.102** Designated historic assets, including listed buildings, conservation areas, scheduled monuments and registered parks and gardens are relatively evenly spread across the District. The greatest concentrations of assets are located in the historic cores and seafronts of its historic settlements, notably Dover, Deal, Sandwich and St Margaret's. Newer settlements, such as Aylesham, have relatively few. The Grade II\* listed Registered Parks and Gardens of Goodnestone Park and Northbourne Court and the Grade II listed Waldershare Park also cover extensive areas of the open countryside.

**4.103** Regardless of the proximity of growth to these noted historic assets, the effects recorded for all options are noted to be uncertain given that impacts will very much depend on the final location, design, scale and layout of development within and around allocated settlements.

**SA objective 10 Conclusions**

**4.104** All options are considered to have the potential to generate significant negative effects against SA objective 10. The effects recorded for all options are noted to be uncertain given that impacts will very much depend on the final location, design, scale and layout of development within and around allocated settlements.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

Spatial Options A-E / Growth Options 1-3	Likely Effects				
	Spatial Option A: Suitable Sites	Spatial Option B: Population Based	Spatial Option C: Settlement Hierarchy	Spatial Option D: Adopted Plan Dover Focus	Spatial Option E: More Even Settlement Focus
Growth Option 1: Lowest Growth	--?	--?	--?	-?	--?
Growth Option 2: Medium Growth	--?	--?	--?	-?	--?
Growth Option 3: Highest Growth	--?	--?	--?	--?	--?
<b>Key</b>					
-- Significant negative effect likely			- Minor negative effect likely		

**4.105** Dover District takes in areas of the Kent Downs AONB to the east and west of Dover, extending along the coast as far as Kingsdown and the uplands to the north east towards Lydden and Shepherdsweil. The southern most areas of the AONB along much of the coastline within the District form part of the White Cliffs Heritage Coast, centring on the white cliffs either side of Dover.

**4.106** Regardless of the proximity of growth to these noted landscape designations, the effects recorded for all options are noted to be uncertain given that impacts will very much depend on the final location, design, scale and layout of development within and around allocated settlements.

**SA objective 11 conclusions**

**4.107** The option that performs best against SA objective 11 is the lowest growth scenario (Growth Option 1) distributed using the spatial strategy in the adopted Local Plan which focuses the vast majority of Growth in and around Dover town and distributes the remaining growth to the larger more urbanised secondary settlements (Spatial Option D). Despite its close proximity to the AONB, there are some notable pockets of Dover and its hinterland that fall outside the designation and its wider settling. Furthermore, minimising the scale of growth and its extent to relatively few larger villages minimises the cumulative impact of the growth on the setting and special character of the countryside.

**4.108** The options that perform the least well against SA objective 11 are those that deliver the most growth to the District's more open and rural villages, particularly those within the AONB and along the heritage coast. The greater the scale of growth the greater the densification of the District's townscapes and urbanisation of its landscapes. Therefore, distributing Growth Option 3 (highest growth) using Spatial Options E (more even settlement focus) is considered to perform the least well against SA objective 11.

**Summary of Effects**

**4.109** The full range of SA effects identified through the SA of the Dover Local Plan growth and spatial options are set out by SA objective in **Table 4.2** below.

**4.110** The lower the scale of growth, the less housing and employment land delivered in the Plan period. Consequently, the lowest growth scenario (Growth Option 1) generally makes a less significant positive contribution to SA objective 1 (housing) and 3 (employment) than the highest growth scenario (Growth Option 3). The greater the scale of housing growth (Growth Option 3), the greater the opportunity to provide affordable homes in the District, although it should be noted that the location of homes is particularly important in addressing affordability.

**4.111** Growth Options 2 and 3 both increase the provision of employment land in the District. The delivery of new employment land could help to limit out-commuting from some areas, particularly where job opportunities are currently limited, for example at Deal, generating indirect positive effects against SA objectives 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change). Beyond Deal, the benefits of new employment land would most likely be maximised in Dover town, considering the stronger sustainable links at this location.

**4.112** The lower the scale of growth, the greater the scope to preserve the District's natural resources, the capacity of the existing infrastructure network, and protect the significance and sensitivities of its natural and historic environments. Consequently, the lowest growth scenario minimises significant adverse effects against SA objectives 2 (health and well-being), 4 (transport), 5 (resources), 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape).

**4.113** Despite this, all growth and spatial options have the potential to generate significant adverse effects against at least some of the SA objectives, particularly against SA objectives 5 (resources), 7 (flood risk), 9 (biodiversity), 10 (historic environment) and 11 (landscape). However, with the notable exception of SA objective 5 (natural resource) and some of the adverse effects identified against the highest growth scenario, the majority of the significant adverse effects identified could potentially be avoided, minimised or significantly mitigated through sensitive site selection and design.

#### Best performing growth and spatial options (Options C and D)

**4.114** Spatial Options C (settlement hierarchy) and D (adopted Plan Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the lowest or medium growth scenarios.

**4.115** Spatial Option C (settlement hierarchy) focusses growth in line with the District's settlement hierarchy, directing more growth to the settlements with the best range and access to service, facilities and job opportunities. This could have benefits in terms of reducing the need to travel by car, encouraging more active healthy lifestyles and limiting air pollution and carbon emissions.

**4.116** Spatial Option D (adopted Plan Dover focus) focusses the vast majority of growth in and around Dover town, and only distributes the remaining need to the most accessible service centres in the smaller, more rural settlements. This approach also helps to address the pockets of higher deprivation within Dover town but would be less effective at making positive use of the other larger settlements beyond Dover, such as Aylesham, Deal and Sandwich. Conversely, focusing growth in and around Dover town helps to maximise the use of the District's brownfield land, protecting the natural environment elsewhere in the District. However, concentrating such a significant scale of growth at a single settlement increases the likelihood of adversely affecting known congestion and air quality issues in the town, for example, along the A2/A20. Spatial Option D (adopted Plan Dover focus), and A (suitable sites), also focus the majority of growth away from the District's most sensitive ecological assets as well as the areas of greatest flood risk in the District. Finally, Spatial Option D (adopted Plan Dover focus) helps to minimise the urbanisation of the open countryside, particularly at the lower growth scenarios.

#### Other growth and spatial options (Options A, B and E)

**4.117** Spatial Option A (suitable sites) focusses growth on identified sites, the vast majority of which are within and in close proximity to Dover. Relatively few suitable and potentially suitable sites have currently been identified at Deal and Sandwich, protecting natural resources, ecological and historic assets in and around these settlements. The remaining growth under Spatial Option A (suitable sites) is dispersed amongst sites identified in the District's rural villages. Developing all suitable and potentially suitable sites in the rural villages would result in a higher number of residents having to travel regularly to access services, facilities and jobs, generating negative effects against SA objectives 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change). Considering the more undeveloped nature of the rural settlements, Spatial Option A (suitable sites) is likely to result in greater greenfield land take across the Plan area, adversely affecting SA objective 5 (resources). The District's smaller rural settlements are more sensitive to development in terms of their historic character due to their relative openness and ruralness, increasing the likelihood of significant adverse effects against SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape).

**4.118** The distribution of development set out through Spatial Option E (more even settlement focus) and Spatial Option B (population based) are similar. These spatial options result in the lowest scales of growth in and around Dover town, in favour of greater growth at Deal and the wider network of small settlements. Both spatial options direct growth to the more flood prone and ecologically sensitive north eastern part of the District, increasing the potential for significant negative effects on SA

objectives 7 (flood risk) and 9 (biodiversity). Farther afield, the growth accommodated by the District's smaller rural settlements would generate the same notably significant negative effects identified for Spatial Option A (suitable sites) against SA objectives 2 (health and well-being), 4 (transport), 5 (resources), 6 (air pollution), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape).

Table 4.2: Summary of likely sustainability effects of 15 growth/spatial options appraised during the preparation of the Draft Local Plan

Growth and Spatial Options / SA Objective	Likely Effects														
	Spatial Option A: Suitable Sites			Spatial Option B: Population Based			Spatial Option C: Settlement Hierarchy			Spatial Option D: Adopted Plan Dover Focus			Spatial Option E: More Even Settlement Focus		
	GO1: Low	GO2: Med	GO3: High	GO1: Low	GO2: Med	GO3: High	GO1: Low	GO2: Med	GO3: High	GO1: Low	GO2: Med	GO3: High	GO1: Low	GO2: Med	GO3: High
SA1: Housing	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
SA2: Health and well-being	++/-	++/-	++/-	-/+	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	-/+	-/+	-/+
SA3: Employment	-/+	++/-	++/-	-/+	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	-/+	-/+	-/+
SA4: Transport	-/+	++/-	-/+	-/+	-/+	-/+	++/-	++/-	++/-	++/-	++/-	++/-	-/+	-/+	-/+
SA5: Resources	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SA6: Air pollution	-/+	-/+	-/+	+/-	+/-	-/+	++/-	++/-	++/-	++/-	++/-	++/-	-/+	-/+	-/+
SA7: Flood risk	--?	--?	--?	--	--	--	--	--	--	-?	-?	-?	--	--	--
SA8: Climate change	-/+	++/-	-/+	-/+	-/+	-/+	++/-	++/-	++/-	++/-	++/-	++/-	-/+	-/+	-/+
SA9: Biodiversity	--?	--?	--	--	--	--	--	--	--	--?	--?	--	--	--	--
SA10: Historic environment	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA11: Landscape	--?	--?	--?	--?	--?	--?	--?	--?	--?	-?	-?	--?	--?	--?	--?
<b>Key</b>	++/- Mixed significant positive and minor negative effect likely			+/- or ++/- Mixed minor or significant effect likely			- Minor negative effect likely			-/+ Mixed significant negative and minor positive effect likely			-- Significant negative effect likely		

# Chapter 5

## Sustainability Appraisal of Site Options

**5.1** Following the appraisal of the growth and spatial options outlined in **Chapter 4**, the Council's reasonable site options were appraised. This chapter describes which options have been considered and which options are considered to be reasonable and unreasonable.

**5.2** The chapter then goes on to appraise the reasonable options against the SA framework, identifying each option's likely significant effects using the site assessment criteria set out in **Appendix C**. The options presented and appraised were defined based on data and evidence available in December 2021. The appraisal of site options in this chapter is 'policy-off', i.e. detailed consideration has not been given to measures that might help to avoid and mitigate adverse effects or enhance positive effects in any given location. This is to ensure that all site options were appraised fairly, based on the same assumptions and to the same level of detail before the Council's final site allocations had been selected. The effects of the Council's selected site allocations, including the policy measures employed to avoid and mitigate identified adverse effects and enhance positive effects are appraised in **Chapter 7**. Further details on the approach to the appraisal of site options in this chapter can be found in the 'Approach to appraisal' section below. **Appendix F** includes assessment proforma for all the site options appraised in **Chapter 5** of the SA Report.

### Identification of Reasonable Alternatives

#### Residential site options

**5.3** The Council has compiled a comprehensive list of sites for assessment through the Council's Housing and Employment Land Availability Assessment (HELAA). The sites came from a range of sources including:

- Sites submitted through the Council's ongoing call for sites exercises;
- Existing allocated sites in the Core Strategy and Land Allocations Local Plan;
- Unimplemented planning permissions, refused planning applications and withdrawn planning applications;
- Sites previously considered as part of the Strategic Land Availability Assessment (2009);
- Sites on the Council's brownfield register;
- Land in the Council's ownership or known by the Council to be available;
- Public sector land; and/or
- Vacant and derelict buildings.

**5.4** Sites were received during the preparation of the Draft Local Plan and as part of the consultation on the Regulation 18 Local Plan. All site options received were subjected to the same evaluation process, including site options resubmitted with alternative boundaries.

**5.5** Sites were then subject to an initial sift and eliminated as unsuitable because they were:

- Too small to be allocated in the Local Plan – sites with capacity to accommodate less than 5 dwellings;
- Entirely covered by national environmental constraints, specifically Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), Ramsar sites, Heritage Coast, ancient woodland and notified safety zones<sup>22</sup>;
- Subject to planning permission (to avoid double counting housing supply);
- Under construction or since built; and/or

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<sup>22</sup> At this stage, sites which were partly covered by these designations were taken forward for further assessment.

- Contrary to the policies in the NPPF, for example isolated development in the open countryside, including the AONB, with no relationship to established settlements.

**5.6** The remaining sites were subjected to a detailed site suitability assessment considering their physical characteristics, land uses, setting in the landscape and historic environment, accessibility and other environmental constraints such as ecology. District and County specialists assessed sites where highways, landscape or historic environment issues were considered to be particularly important.

#### Draft Local Plan residential site options

**5.7** During the preparation of the Regulation 18 Draft Local Plan, the suitability assessment determined:

- 93 sites, as suitable<sup>23</sup>;
- 41 sites, as potentially suitable<sup>24</sup>; and
- 197 sites, as unsuitable<sup>25</sup>.

**5.8** The remaining 33 sites gained planning consent during the assessment process and were therefore removed from the site assessment process.

**5.9** The 134 suitable and potentially suitable sites were then subjected to an availability assessment to determine that the sites were available for development within the Plan period. This involved contacting the relevant site owners/promoters to confirm the sites availability for development with the next 15-20 years. The availability assessment revealed:

- 114 sites, as available<sup>26</sup>;
- 12 sites, as potentially available<sup>27</sup>; and
- 8 sites, as unavailable<sup>28</sup>.

**5.10** The draft HELAA (December 2020) process concluded that the 126 sites, with a capacity to accommodate 13,654 dwellings, were suitable or potentially suitable and available or potentially available. The Council was unable to contact the landowners of eight sites to confirm their availability before the SA work was carried out. Therefore, these eight sites were subjected to SA alongside the other 126 sites on a precautionary basis.

#### Publication Local Plan residential site options

**5.11** During the consultation on the Regulation 18 Draft Local Plan the Council undertook an additional targeted call for sites exercise. 120 sites were submitted for consideration comprising land for housing, self-build, gypsy and traveller accommodation, employment and local green spaces. The stage 1 assessment resulted in 68 sites being eliminated. The 3 Local Green Spaces submitted as part of the targeted call for sites were also sifted out at this stage and considered separately. Of the 49 sites taken forward for suitability assessment 36 sites were for housing / self-build and 2 sites was submitted for mixed use and were therefore considered as part of the assessment of housing sites and part of the assessment of employment sites. The suitability assessment of the newly promoted residential sites determined an additional:

- 12 housing sites, as suitable;
- 4 housing sites, as potentially suitable and 1 mixed use site as potentially suitable; and
- 20 housing sites, as unsuitable and 1 mixed use site as unsuitable.

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<sup>23</sup> Suitable is defined in the HELAA as: 'site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.'

<sup>24</sup> Potentially suitable is defined in the HELAA as: 'site offers a potentially suitable location for development for the use proposed but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.'

<sup>25</sup> Unsuitable is defined in the HELAA as: 'site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.'

<sup>26</sup> Available is defined in the HELAA as: 'landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.'

<sup>27</sup> Potentially available is defined in the HELAA as: 'Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.'

<sup>28</sup> Land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.'



**5.12** The 17 suitable and potentially suitable housing sites and 1 potentially suitable mixed use site were then subjected to an availability assessment to determine that the sites were available for development within the Plan period. This involved contacting the relevant site owners/promoters to confirm the sites availability for development with the next 15-20 years. The availability assessment revealed:

- 18 sites, as available;
- 0 sites, as potentially available; and
- 0 sites, as unavailable.

**5.13** The HELAA has been updated since Regulation 18 to reflect:

- Updated technical evidence
- Representations made through the consultation on the Regulation 18 Draft Local Plan
- Changes in the planning status of sites.
- Changes in the development capacity of sites.
- Changes in the availability of sites.
- Changes in the suitability of sites.

**5.14** Since the HELAA was published in January 2021, one site (SHE013) has changed from being deleted to being included and this results in 365 sites within the existing HELAA. Of the 365 sites, 46 have gained planning permission or are awaiting completions of a S106 legal agreement, and five are allocated in the Ash Neighbourhood Plan made by the Council in September 2021. Of the remaining 314 sites, the following assessments apply:

#### **Suitability Assessment**

- 72 sites are suitable.
- 11 sites are potentially suitable.
- 223 sites are unsuitable.
- 8 sites have mixed suitability.

#### **Availability Assessment**

**5.15** Of the 91 sites that are part suitable or suitable and are part potentially suitable or potentially suitable:

- 80 sites are available.
- 11 sites are unavailable.

#### **Achievability Assessment**

**5.16** Of the 80 sites that were part suitable or suitable and are part potentially suitable or potentially suitable and are available:

- 58 sites achievable.
- 8 sites marginally achievable.
- 14 sites unachievable.

**5.17** The 14 sites assessed as unachievable are within the Dover urban area. Review of these sites has determined that development would facilitate needed regeneration, and that removing the policy requirement for 30% of dwellings to be affordable would allow the sites to become achievable.

**5.18** All site options found to be suitable and potentially suitable during the preparation of the Draft Local Plan or Publication Local Plan have been subjected to SA and their effects can be found below. Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan because they were no longer considered suitable or potentially suitable, are marked with an “\*” at the end of their site reference below.

**5.19** The HELAA including the targeted call for sites process concluded that 95 sites with a capacity to accommodate 10,071 dwellings are suitable and are available. Further details on the Council’s HELAA process can be found in the Council’s HELAA Report (September 2022).

### Employment site options

**5.20** Options for allocating further land for employment development have been limited in recent years. However, there is still some remaining development potential on existing allocations, which can be rolled forward into the new Local Plan.

#### Draft Local Plan employment site options

**5.21** In the absence of other known reasonable employment site options, the Council reviewed and subjected the 23 known existing employment sites in the District to SA to evaluate their potential for reallocation in the Draft Local Plan.

**5.22** At this time, there was uncertainty around the level of jobs growth anticipated over the Plan period and the amount of new employment land that would be required to deliver this. Furthermore, there was uncertainty around the future availability of White Cliffs Business Park for general employment purposes, as well as the capacity of Discovery Park to accommodate more growth.

**5.23** It was considered likely more capacity would be required to deliver the Council's Economic Strategy, so the Council carried out a targeted call for sites exercise that included employment sites as part of the Regulation 18 consultation on the Draft Local Plan. New reasonable site options identified through this exercise were then considered and subjected to SA as part of the preparation of the Publication Local Plan.

#### Publication Local Plan employment site options

**5.24** During the consultation on the Regulation 18 Draft Local Plan the Council undertook an additional targeted call for sites exercise. The suitability assessment of the newly promoted employment sites determined an additional:

- 3 employment sites, as suitable;
- 2 employment sites, and 1 mixed use site as potentially suitable; and
- 2 employment sites, as unsuitable.

**5.25** The employment sites in the HELAA have also been updated since Regulation 18 to reflect:

- Updated technical evidence
- Representations made through the consultation on the Regulation 18 Draft Local Plan.
- Changes in the planning status of sites.
- Changes in the estimated development potential of sites.
- Changes in the suitability of sites.

**5.26** The HELAA including the targeted call for sites process concluded that 29 sites with a capacity to accommodate 189,182sqm of employment floorspace are suitable or potentially suitable. This floorspace figure does not however take into account a number of potential regeneration sites that have been identified in the District as being suitable or potentially suitable for employment purposes, as the floorspace of these sites will need to be determined through the planning application process in accordance with the policies in the Plan.

#### Mixed use site options

**5.27** The following suitable and potentially suitable site options have been promoted for a mixture of residential and employment uses and have therefore been appraised against both the housing and employment site assessment criteria in **Appendix C** separately, i.e. they feature in both the residential and employment site appraisal sections and summary tables below:

- TC4S083 The Citadel, Western Heights, Dover;
- DEA012A Land between the A256 and North Deal;
- DOV017r Dover Waterfront, Dover;
- DOV017r2 res Dover Waterfront, Dover;
- DOV017r2 emp Dover Waterfront, Dover;
- DOV018 Mid Town, Dover; and,
- DOV007 Former Co-op, Castle Street, Dover.

### Gypsy and traveller site options

**5.28** The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arc4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover on existing sites in the District, and 19 potential pitches on existing sites, resulting in a residual need to identify 13 pitches.

#### Draft Local Plan gypsy and traveller site options

**5.29** During the preparation of the Draft Local Plan, three site options were identified for assessment, covering existing sites potentially suitable for expansion and new locations:

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and
- Land East of Kestrels Fen and South of Ash Road, Sandwich.

**5.30** The assessment drew on site analysis undertaken by arc4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

**5.31** The site in Sandwich was discounted as unsuitable due to the site being located in flood zone 2 and 3, the need for significant highways and water mains connections work and its distance from schools, health and local services.

**5.32** The two remaining sites were assessed as being potentially suitable and were therefore subjected to SA.

**5.33** Small intensification sites identified through the GTAA 2020 were not subjected to SA due to their existing established Gypsy and Traveller use and the sites being below the HELAA methodology site threshold.

#### Publication Local Plan gypsy and traveller site options

**5.34** During the consultation on the Regulation 18 Draft Local Plan, an additional five site options were identified for assessment:

- TC4S043 The Paddock, Ferne Lane, Alkham.
- TC4S044 Halfacres, Short Lane, Alkham.
- TC4S049 Hollyoaks Stables, Land South Side Ferne Lane, Chalksole, Alkham.
- TC4S050 Sherley Farm, Reach Road, St Margaret's at Cliffe.
- TC4S089 Land to the South of Ackholt Road, Aylesham.

**5.35** The sites were evaluated in the same way as the options evaluated during the preparation of the Draft Local Plan.

**5.36** Four sites (TC4S043, TC4S049, TC4S050 and TC4S089) were discounted as unsuitable due to their rural location and/or location in the AONB and therefore unacceptable landscape impacts.

**5.37** The remaining site (TC4S044) was assessed to be potentially suitable and was therefore subjected to SA. At the time of appraisal, TC4S044 was assessed as a new site. The site has subsequently been granted consent and is now allocated as an intensification site.

### Approach to Appraisal

**5.38** Each residential and gypsy and traveller site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table C.1** in **Appendix C**. Each employment site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table C.2** in **Appendix C**. These assessment criteria are designed to highlight the potential effects generated by development in each location before detailed consideration has been given to measures that might help to avoid and mitigate adverse effects or enhance positive effects in any given location. This is a conscious decision to ensure that all site options have been appraised to the same level of detail.

**5.39** It is recognised that in some cases site promoters have specified the location of development within promoted site boundaries and this has been considered by the Council in selecting and or allocating land use distribution on sites. However, not all site options have detailed development plans. In order to ensure that all options are appraised to the same level of detail, all options have been appraised at a high level based on each site's redline boundary and the Council's most up-to-date evidence base.

**5.40** It is also recognised that some residential site options may include some commercial, business, service and community uses associated with the creation of new or densification of existing residential areas. The benefits of such mixed use development in predominantly residential site options is acknowledged to have some employment benefits in the SA; however, such mixed use developments have not been appraised separately as employment sites. The employment site assessment criteria have been used to appraise employment allocations in the Local Plan.

**5.41** The residential site option appraisals benefit from Council officer assessment of national and local landscape and historic environment sensitivities.

**5.42** The appraisal of site options against SA objective 2 (health and well-being) has been split in two to draw the notable distinction between the relative health and well-being benefits of sites being in close proximity to existing local services and facilities (2a) and the potential for adverse effects of sites being in close proximity to environs that have the potential to compromise the health and well-being of residents and workers (2b).

**5.43** All site options considered at both the Draft (Regulation 18) and Publication Local Plan (Regulation 19) stages to be suitable and potentially suitable<sup>29</sup> are organised from the strongest performing at the top to the weaker performing at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects. This basic ranking process is only designed to highlight broad variations in the likely effects of site options before consideration of appropriate measures to avoid and mitigate adverse effects and enhance positive effects in any given site location, i.e. no effects are reported as unavoidable or unmitigable at this stage in the SA process.

**5.44** Following the selection of the preferred site options for allocation in the Draft Local Plan, changes were made to the boundaries of a small number of residential and employment sites to better manage the issues and aspirations at each allocation and address considerations that had been raised by key stakeholders. Similarly, several site options were resubmitted by site promoters in response to the Regulation 18 consultation with alternative boundaries. These redrawn site options have been appraised alongside their originals and other sites for comparison. They can be distinguished from their original counterparts through the addition of an 'r' at the end of the site reference.

**5.45** The site options that have been selected for allocation in the Publication Local Plan are highlighted in **bold**. The Council's reasoning for the selection of the selected site options over the reasonable alternatives is set out at the end of this chapter, and further details can be found in **Appendix D**.

**5.46** The effects of the Council's selected site allocations, including the policy measures employed to avoid and mitigate identified adverse effects and enhance positive effects are appraised in **Chapter 7**.

## Residential Site Option SA Findings

**5.47** All the residential site options considered at both the Draft Local Plan and Publication Local Plan stages are illustrated in **Figure 5.1**.

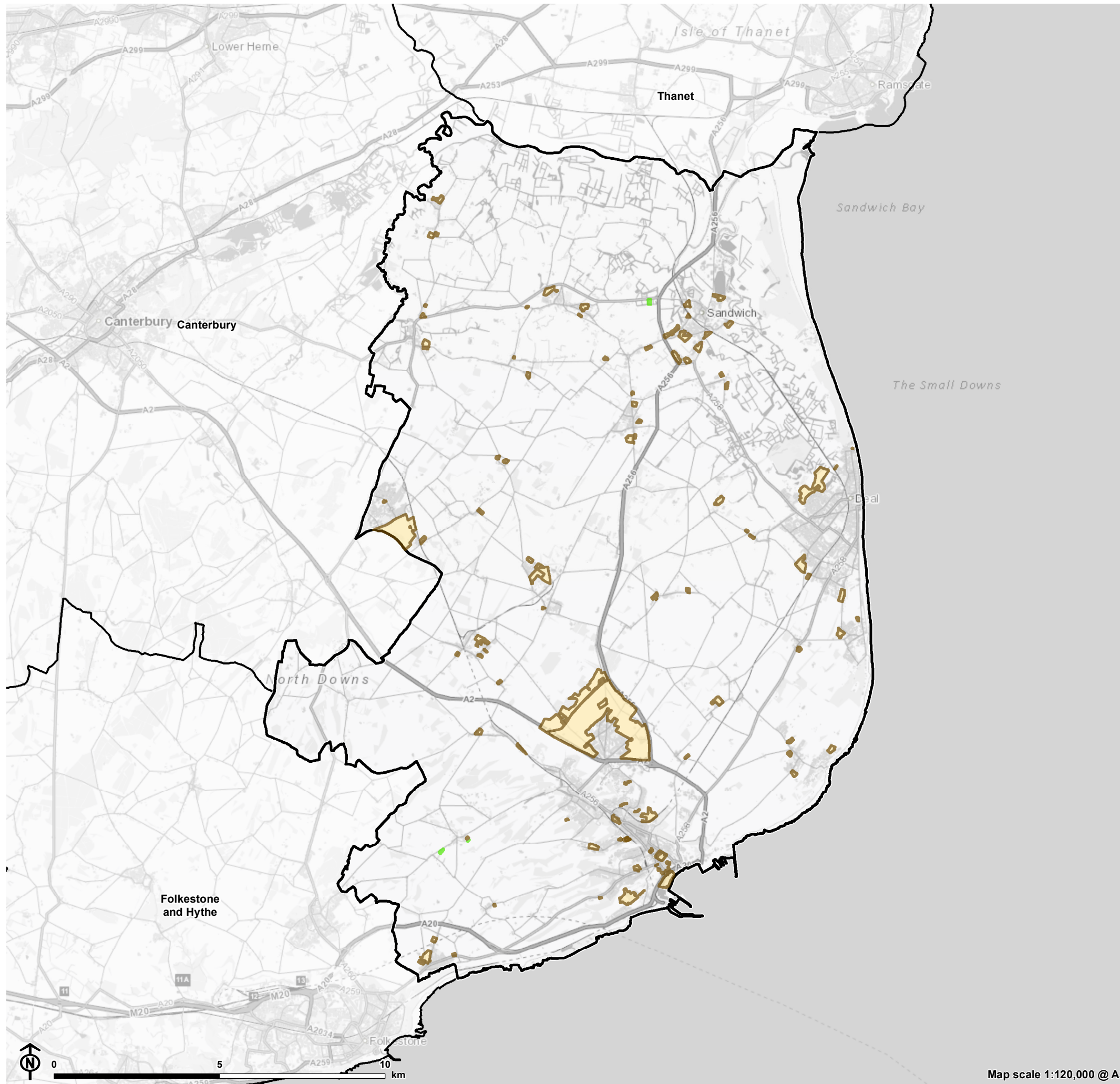
**5.48** **Tables 5.1 to 5.6** illustrate the effects of all the reasonable residential site options appraised, organised and described based on the District's latest Settlement Hierarchy:

- **Table 5.1** illustrates the effects of the reasonable site options in and around the District's only regional centre: **Dover**. The table also includes the site options in and around the village of **Whitfield**, which lies particularly close to Dover.
- **Table 5.2** illustrates the effects of site options in and around the District's District centre: **Deal**.
- **Table 5.3** illustrates the effects of the reasonable site options in and around the District's rural service centres: **Aylesham** and **Sandwich**.
- **Table 5.4** illustrates the effects of the reasonable site options in and around the District's local centres: **Ash, Eastry, Elvington, Eythorne, Shepherdswell with Coldred, St Margret's at Cliffe** and **Wingham**.

<sup>29</sup> A thorough sifting process was undertaken through the HELAA to sift out unsuitable sites, i.e. sites that do not represent reasonable alternatives, before the SA of sites was carried out. Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an '\*' at the end of their site reference below.

- **Table 5.5** illustrates the effects of the reasonable site options in and around the District's villages (Alkham, Capel le Ferne, East Langdon, Kingsdown, Lydden, Northbourne, Preston, Worth, Chillenden, East Studdal, Finglesham, Great Mongeham, Nonington, Ringwould, Staple, Tilmanstone, West Hougham and Woodnesborough).

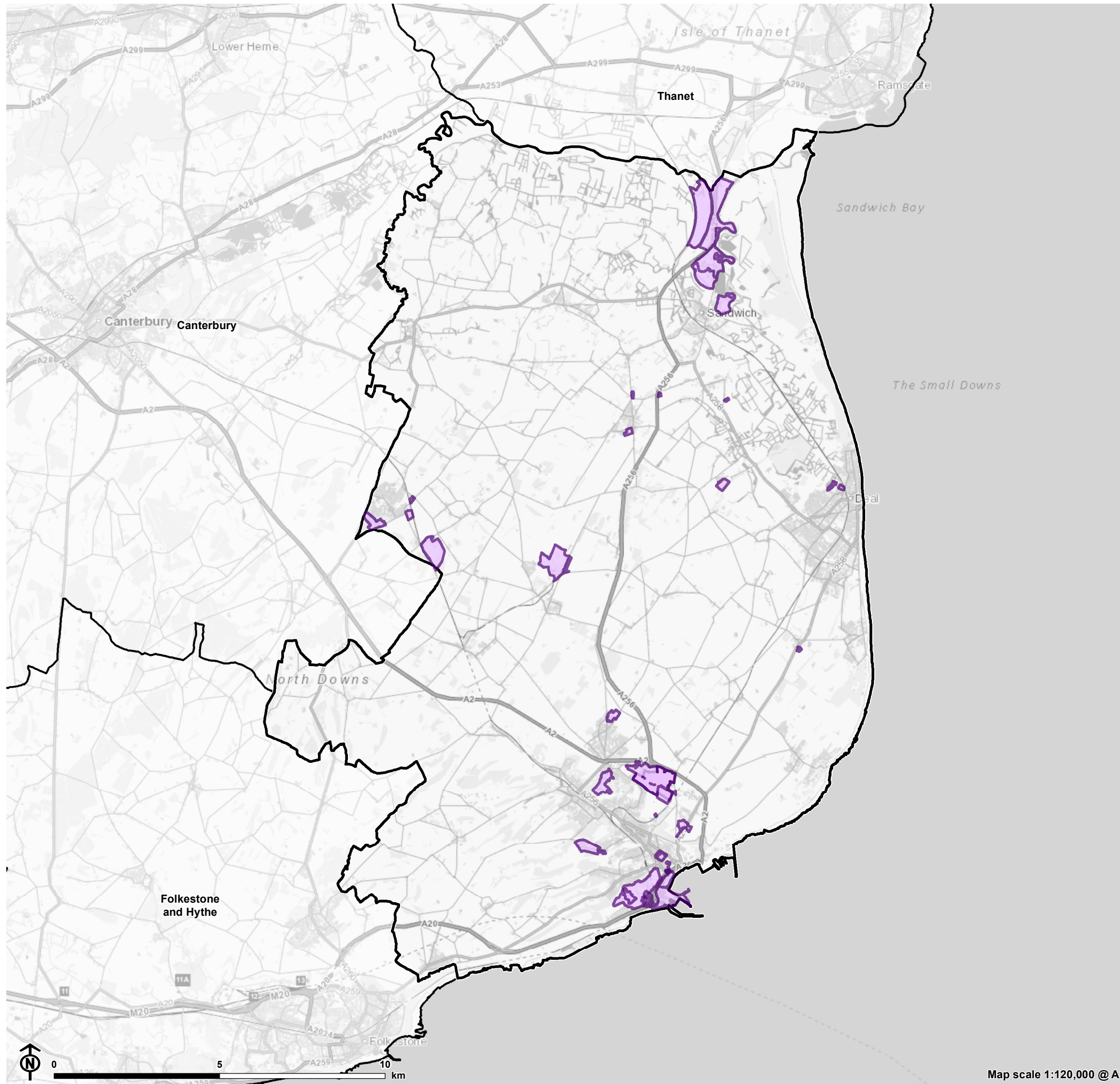
Figure 5.1: Reasonable Residential Site Options



- District boundary
- Neighbouring district boundary
- Residential site option
- Gypsy and traveller site option

Map scale 1:120,000 @ A3

Figure 5.2: Reasonable Employment Site Options



- District boundary
- Neighbouring district boundary
- Employment site option

Map scale 1:120,000 @ A3

Table 5.1: Dover (including Whitfield) residential site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Dover												
<b>DOV019</b>	+	+	-	+	++	0	0?	0	++	-	-?	0?
DOV021*	+	++	--	+	++	0	0?	0	++	-	-?	0?
DOV032	+	++	-	+	++	-	0?	--	++	0	-?	0?
<b>TC4S026</b>	+	++	--	+	++	0	0?	0	++	-	-?	-?
DOV007	+	++	-	+	++	-	0?	--	++	-	-?	0?
<b>DOV018r</b>	+	++	--	+	++	-	0?	--	++	0	-?	0?
DOV018	+	++	--	+	++	-	0?	--	++	0	-?	0?
<b>DOV028</b>	+	++	--	+	++	-	0?	--	++	0	-?	0?
<b>TC4S028</b>	+	+	0	+	+	-	0?	0	+	-	0?	0?
<b>DOV017r2 res</b>	+	++	--	+	++	-	0?	--	++	-	-?	0?
<b>23r – Western Heights res</b>	+	+	-	+	++	0	0?	-	++	--	-?	0?
<b>DOV022Br</b>	+	+	-	+	+	0	0?	-	+	-	0?	0?
DOV022B	+	+	-	+	+	0	0?	-	+	-	0?	0?



Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
<b>DOV022E</b>	+	+	0	+	+	-	0?	-	+	-	0?	0?
<b>DOV030</b>	+	+	-	+	+	0	0?	0	+	-	-?	0?
DOV010*	+	+	0	+	+	--	0?	0	+	0	0?	0?
<b>TC4S030</b>	+	+	0	+	+	--	0?	0	+	-	0?	0?
DOV009*	+	+	0	+	+	--	0?	0	+	-	-?	0?
<b>TC4S027r</b>	+	+	0	+	+	-	0?	--	+	-	0?	0?
TC4S027	+	+	0	+	+	-	0?	--	+	-	0?	0?
<b>DOV006</b>	+	+	0	+	+	-	0?	-	+	--	-?	0?
DOV025*	+	+	0	+	+	-	0?	-	+	--	0?	-?
<b>DOV022C</b>	+	+	0	+	+	--	0?	--	+	-	0?	0?
DOV026	+	+	0	+	+	--	0?	--	+	-	0?	0?
DOV029*	+	+	0	+	+	-	0?	--	+	--	0?	0?
TC4S083	+	+	--	+	+	0	0?	0	+	--	-?	0?
<b>DOV008</b>	+	-	0	+	-	-	0?	0	-	-	0?	0?
DOV022A*	+	+	--	+	+	--	0?	-	+	-	0?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
DOV035*	+	+	--	+	+	-	0?	--	+	0	-?	0?
<b>DOV017r</b>	+	+	--	+	+	-	0?	--	+	-	-?	0?
<b>DOV023</b>	+	+	--	+	+	-	0?	--	+	-	-?	0?
<b>DOV026r</b>	+	+	0	+	+	--	0?	--	+	--	0?	0?
TC4S115	+	+	0	+	+	--	0?	--	+	--	-?	--?
DOV017	+	+	--	+	+	-	0?	--	+	--	-?	0?
TC4S058	+	-	0	+	-	-	0?	--	-	-	0?	-?
DOV012*	+	-	0	+	-	-	0?	--	-	--	-?	0?
GUS001	+	-	0	+	-	--	0?	--	-	0	-?	-?
GUS002*	+	+	--	+	+	--	0?	--	+	--	-?	-?
Whitfield												
WHI006*	+	0	0	+	+	-	0?	-	+	0	0?	0?
WHI007	+	-	0	+	-	--	0?	--	-	0	-?	0?
<b>WHI008</b>	+	+	--	+	+	--	0?	--	+	--	-?	0?
WHI004	+	-	-	+	--	--	0?	0	--	0	-?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
WHI002	+	-	-	+	--	--	0?	0	--	-	-?	0?
WHI003	+	--	0	+	--	--	0?	0	--	0	-?	0?
WHI005	+	--	0	+	--	--	0?	0	--	-	-?	0?
<b>WHI001r</b>	+	-	--	+	-	--	0?	--	-	--	-?	0?
WHI001	+	-	--	+	-	--	0?	--	-	--	-?	0?
<b>Key<sup>30</sup></b>	++ Significant positive effect likely		+ Minor positive effect likely		- Minor negative effect likely			-- Significant negative effect likely			0 Negligible effect likely	

<sup>30</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

Table 5.2: Deal residential site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Deal												
DEA018*	+	+	0	+	+	-	0?	0	+	-	-?	0?
<b>TC4S047</b>	+	+	0	+	+	0	0?	--	+	-	0?	0?
DEA021*	+	+	0	+	+	0	0?	--	+	-	-?	0?
DEA020*	+	-	0	+	+	--	0?	-	+	0	-?	0?
<b>TC4S008</b>	+	-	0	+	0	--	0?	-	0	0	0?	0?
<b>TC4S032</b>	+	-	0	+	0	-	0?	--	0	0	0?	0?
DEA012A	+	+	0	+	+	--	0?	--	+	-	-?	0?
SHO002*	+	0	--	+	+	--	0?	-	+	-	-?	0?
<b>DEA008</b>	+	-	0	+	-	--	0?	0	-	-	-?	0?
SHO004*	+	-	--	+	0	--	0?	0	0	-	-?	0?
<b>WAL002</b>	+	-	0	+	-	-	0?	--	-	-	-?	-?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
<b>Key</b> <sup>31</sup>	+		-			-			0			
	Minor positive effect likely		Minor negative effect likely			Significant negative effect likely			Negligible effect likely			

<sup>31</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

Table 5.3: Rural service centre residential site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Aylesham												
<b>AYL001</b>	+	0	0	+	+	--	0?	0	+	0	-?	0?
AYL004r*	+	-	0	+	-	--	0?	--	-	-	-?	-?
<b>AYL003r2</b>	+	+	0	+	+	--	0?	--	+	--	-?	-?
AYL003r	+	+	0	+	+	--	0?	--	+	--	-?	-?
AYL003	+	+	0	+	+	--	0?	--	+	--	-?	-?
AYL002*	+	-	0	+	-	--	0?	0	-	-	-?	-?
AYL005	+	-	0	+	-	-	0?	0	-	--	-?	-?
AYL004*	+	-	0	+	+	--	0?	--	+	-	-?	-?
Sandwich												
<b>SAN008</b>	+	+	0	+	+	0	0?	--	+	-	-?	-?
<b>SAN004</b>	+	+	0	+	+	--	0?	--	+	-	-?	0?
<b>SAN006</b>	+	+	0	+	+	0	0?	--	+	--	-?	-?
<b>SAN013</b>	+	+	0	+	+	--	0?	--	+	-	-?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
SAN015r*	+	+	0	+	+	--	0?	--	+	-	0?	-?
SAN015*	+	+	0	+	+	--	0?	--	+	-	0?	-?
<b>SAN007</b>	+	+	0	+	+	--	0?	--	+	-	-?	-?
SAN016	+	+	--	+	+	--	0?	0	+	-	-?	-?
<b>SAN023</b>	+	+	0	+	+	--	0?	--	+	-	-?	-?
SAN024*	+	+	--	+	+	--	0?	0	+	-	-?	-?
<b>SAN019r</b>	+	-	-	+	0	--	0?	0	0	-	-?	0?
SAN019*	+	-	--	+	0	--	0?	--	0	-	-?	0?
SAN010	+	-	--	+	-	--	0?	--	-	-	0?	-?
<b>Key<sup>32</sup></b>	+			-			--			0		
	Minor positive effect likely			Minor negative effect likely			Significant negative effect likely			Negligible effect likely		

<sup>32</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

Table 5.4: Local centre residential site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Ash												
ASH015	+	0	0	+	-	--	0?	0	-	0	0?	0?
ASH003	+	-	0	+	-	--	0?	0	-	0	-?	0?
ASH011	+	-	0	+	-	--	0?	0	-	0	-?	0?
ASH005*	+	-	0	+	-	--	0?	0	-	0	-?	-?
ASH014	+	-	0	+	-	--	0?	-	-	0	-?	0?
ASH010*	+	-	0	+	-	--	0?	--	-	-	-?	-?
ASH004	+	-	--	+	-	--	0?	--	-	-	-?	-?
ASH008*	+	-	--	+	-	--	0?	--	-	-	-?	-?
Eastry												
EAS011*	+	-	0	+	-	-	0?	0	-	0	-?	0?
<b>EAS002</b>	+	-	0	+	-	-	0?	-	-	-	-?	-?
EAS007	+	-	0	+	-	--	0?	0	-	0	-?	-?
<b>TC4S023</b>	+	-	0	+	-	--	0?	0	-	0	-?	-?



Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
<b>EAS009</b>	+	-	0	+	-	--	0?	--	-	-	-?	0?
EAS012*	+	-	0	+	-	--	0?	--	-	-	-?	0?
Elvington*												
<b>EYT008</b>	+	0	0	+	0	-	0?	0	0	0	-?	0?
<b>EYT003</b>	+	0	0	+	0	--	0?	0	0	0	-?	0?
<b>EYT012</b>	+	-	0	+	-	-	0?	0	-	0	-?	0?
EYT004*	+	+	0	+	+	--	0?	--	+	0	-?	-?
<b>EYT009</b>	+	+	0	+	+	--	0?	--	+	-	-?	0?
EYT015*	+	-	0	+	-	-	0?	0	-	0	-?	-?
EYT002*	+	-	0	+	-	-	0?	0	-	0	-?	-?
Eythorne												
<b>TC4S039r</b>	+	-	0	+	-	-	0?	0	-	-	0?	-?
TC4S039*	+	-	0	+	-	-	0?	0	-	-	0?	-?
EYT019*	+	-	0	+	-	--	0?	0	-	0	-?	0?
EYT001*	+	-	0	+	-	--	0?	--	-	0	0?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Shepherdswell with Coldred												
<b>SHE008</b>	+	0	0	+	+	-	0?	0	+	0	-?	0?
<b>TC4S082</b>	+	-	0	+	+	-	0?	0	+	0	0?	0?
SHE001*	+	-	0	+	+	-	0?	0	+	0	-?	-?
<b>SHE004r2</b>	+	-	0	+	+	-	0?	0	+	-	-?	-?
SHE004r	+	-	0	+	+	-	0?	0	+	-	-?	-?
SHE004	+	-	0	+	+	-	0?	0	+	-	-?	-?
<b>SHE013</b>	+	-	0	+	-	-	0?	0	-	0	-?	0?
<b>SHE006</b>	+	-	0	+	0	--	0?	--	0	0	-?	0?
SHE003*	+	-	0	+	-	--	0?	--	-	-	-?	-?
St Margret's at Cliffe												
<b>STM010</b>	+	-	0	+	-	-	0?	0	-	-	-?	-?
STM011*	+	-	0	+	-	-	0?	0	-	-	-?	-?
TC4S073	+	-	0	+	-	-	0?	0	-	-	-?	-?
<b>STM003</b>	+	-	0	+	-	--	0?	0	-	-	0?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
STM006	+	-	0	+	-	--	0?	0	-	0	-?	0?
STM007	+	-	0	+	-	--	0?	0	-	0	--?	0?
STM008	+	-	0	+	-	--	0?	0	-	0	--?	0?
Wingham												
WIN003	+	-	0	+	-	--	0?	0	-	0	0?	0?
WIN004	+	-	0	+	-	--	0?	-	-	-	-?	0?
WIN014	+	-	--	+	-	--	0?	0	-	0	0?	-?
WIN006	+	-	--	+	-	--	0?	0	-	0	-?	-?
<b>Key<sup>33</sup></b>	+		-			--		0			Negligible effect likely	
	Minor positive effect likely		Minor negative effect likely			Significant negative effect likely						

<sup>33</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

Table 5.5: Village residential site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Alkham												
<b>ALK003</b>	+	-	0	+	-	--	0?	--	-	0	0?	0?
Capel le Ferne												
<b>CAP009</b>	+	-	0	+	-	--	0?	0	-	0	-?	0?
<b>CAP013</b>	+	-	0	+	-	--	0?	0	-	0	-?	0?
<b>CAP006r</b>	+	-	0	+	-	--	0?	0	-	-	-?	0?
<b>CAP011</b>	+	-	0	+	-	--	0?	-	-	-	-?	-?
CAP006	+	-	0	+	-	--	0?	--	-	-	-?	0?
Chillenden												
GOO007	+	-	0	+	-	--	0?	0	-	0	-?	-?
<b>GOO006</b>	+	-	0	+	-	--	0?	--	-	0	--?	0?
East Langdon												
<b>LAN003</b>	+	-	0	+	-	--	0?	0	-	0	-?	0?
East Studdall												

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
SUT002*	+	-	0	+	-	--	0?	0	-	0	-?	0?
SUT009*	+	-	0	+	-	--	0?	0	-	0	-?	0?
TC4S064	+	--	0	+	-	--	0?	-	-	0	0?	-?
Finglesham												
NOR001*	+	-	0	+	-	--	0?	0	-	-	-?	-?
NOR003*	+	-	0	+	-	--	0?	--	-	-	-?	0?
Great Mongeham												
<b>GTM003</b>	+	-	0	+	-	--	0?	0	-	0	-?	0?
Kingsdown												
<b>TC4S074</b>	+	-	0	+	-	0	0?	0	-	-	0?	-?
<b>KIN002</b>	+	-	0	+	-	0	0?	0	-	-	-?	-?
Lydden												
<b>LYD003r</b>	+	+	0	+	+	--	0?	--	+	0	-?	0?
LYD003	+	+	0	+	+	--	0?	--	+	0	-?	0?
LYD001	+	-	0	+	-	-	0?	--	-	-	-?	-?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Nonington												
NON004*	+	-	0	+	-	--	0?	0	-	0	-?	0?
<b>NON006r</b>	+	-	0	+	-	--	0?	0	-	0	-?	0?
NON006	+	-	0	+	-	--	0?	0	-	0	-?	0?
NON009*	+	-	0	+	-	--	0?	0	-	0	-?	0?
Northbourne												
NOR002	+	-	0	+	-	--	0?	0	-	--	-?	0?
NOR005*	+	-	--	+	-	--	0?	--	-	--	-?	0?
Preston												
<b>PRE003</b>	+	-	0	+	-	--	0?	0	-	-	0?	0?
<b>PRE016</b>	+	-	0	+	-	--	0?	0	-	-	0?	0?
TC4S099	+	-	0	+	-	--	0?	-	-	-	-?	0?
PRE001*	+	-	0	+	-	--	0?	0	-	--	0?	-?
<b>PRE017</b>	+	-	0	+	-	--	0?	--	-	-	0?	0?
PRE007*	+	-	0	+	-	--	0?	--	-	-	-?	-?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Ringwould												
<b>RIN002</b>	+	-	--	+	-	--	0?	0	-	0	-?	0?
<b>RIN004</b>	+	-	--	+	-	--	0?	0	-	0	-?	0?
RIN003*	+	--	--	+	-	--	0?	-	-	-	-?	0?
Staple												
<b>STA004</b>	+	-	0	+	-	--	0?	0	-	0	--?	-?
STA009*	+	-	0	+	-	--	0?	--	-	0	--?	0?
STA010*	+	-	0	+	--	--	0?	--	--	0	0?	0?
STA003*	+	--	0	+	--	--	0?	--	--	0	0?	-?
STA008r*	+	--	0	+	--	--	0?	0	--	0	--?	-?
STA008*	+	--	0	+	--	--	0?	0	--	0	--?	-?
Tilmanstone												
TIL001*	+	-	--	+	-	-	0?	0	-	0	-?	0?
West Hougham												
HOU004*	+	-	0	+	-	--	0?	0	-	0	0?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
TC4S102	+	-	0	+	-	-	0?	0	-	0	-?	0?
Woodnesborough												
WOO002*	+	-	0	+	-	--	0?	0	-	0	0?	0?
<b>WOO005</b>	+	-	0	+	-	--	0?	0	-	0	0?	0?
<b>WOO006</b>	+	-	0	+	-	--	0?	0	-	-	-?	0?
WOO007*	+	--	0	+	-	--	0?	0	-	0	-?	0?
Worth												
WOR007*	+	-	0	+	-	--	0?	0	-	-	-?	0?
<b>WOR009</b>	+	-	0	+	-	--	0?	0	-	-	-?	0?
<b>WOR006</b>	+	-	0	+	-	--	0?	--	-	-	0?	0?
<b>Key<sup>34</sup></b>	+		-			--		0				
	Minor positive effect likely			Minor negative effect likely			Significant negative effect likely			Negligible effect likely		

<sup>34</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.



Table 5.6: Gypsy and traveller site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Alkham												
TC4S044	+	-	0	+	-	--	0?	--	-	-	0?	-?
Land to the south of Alkham Valley Road	+	--	0	+	-	--	0?	--	-	-	-?	-?
Aylesham												
Land to the North of Snowdown Caravan Site	+	-	0	+	-	--	0?	0	-	0	0?	0?
<b>Key<sup>35</sup></b>	+		-			--			0			
	Minor positive effect likely		Minor negative effect likely			Significant negative effect likely			Negligible effect likely			

<sup>35</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

Table 5.7: Employment site options SA findings

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
Aylesham												
4 – Aylesham Development Area_r	0	+	0	+	++	--	0?	0	++	-	-?	0?
<b>4 – Aylesham Development Area</b>	0	+	0	+	++	--	0?	0	++	-	-?	0?
19 – Aylesham Industrial Estate	0	0	0	+	+	--	0?	0	+	--	0?	0?
<b>14 – Land off Holt Street</b>	0	0	--	+	+	--	0?	-	+	--	-?	-?
Deal												
11 – Albert Road	0	++	0	+	++	0	0?	--	++	--	-?	0?
DEA012A	0	++	0	+	++	--	0?	--	++	-	-?	0?
10 – Deal Business Park	0	+	0	+	+	0	0?	--	+	--	0?	0?
Dover												
23 – The Citadel	0	++	-	+	++	0	0?	0	++	--	-?	0?
<b>23r – Western Heights emp</b>	0	+	-	+	++	0	0?	-	++	--	-?	0?
<b>21 – Midtown_r</b>	0	+	-	+	++	-	0?	--	++	-	-?	0?
21 – Midtown	0	+	-	+	++	-	0?	--	++	-	-?	0?

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
22 – Carparks off Castle and Church Street	0	++	-	+	++	-	0?	--	++	--	-?	0?
17 – A20 Sites	0	++	--	+	++	0	0?	--	++	--	-?	0?
<b>DOV017r2 emp</b>	0	++	--	+	++	-	0?	--	++	--	-?	0?
TC4S083	0	+	-	+	+	0	0?	0	+	--	-?	0?
TC4S120	0	0	0	+	+	--	0?	0	+	--	-?	-?
8 – Barwick Road Industrial Estate	0	+	0	+	+	--	0?	--	+	--	0?	0?
<b>TC4S092</b>	0	+	0	+	+	--	0?	--	+	--	-?	0?
9 – Western Docks	0	+	--	+	+	-	0?	--	+	--	-?	0?
<b>18 – Dover Waterfront_r</b>	0	+	--	+	+	-	0?	--	+	--	-?	0?
18 – Dover Waterfront	0	+	--	+	+	-	0?	--	+	--	-?	0?
TC4S075	0	-	0	+	-	-	0?	--	-	--	-?	-?
Eastry												
15 – Land East of Foxborough Hill	0	-	0	+	-	--	0?	0	-	-	-?	-?
24 – Eastry Hospital	0	-	0	+	-	--	0?	--	-	-	-?	0?
Elvington / Eythorne												

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
5 – Pike Road Industrial Estate	0	+	-	+	+	-	0?	-	+	-	0?	0?
Northbourne												
6 – Betteshanger Colliery	0	0	--	+	0	--	0?	--	0	--	-?	0?
Ringwould												
16 – Land at Ringwould Alpines	0	0	0	+	0	--	0?	0	0	-	-?	0?
Sandwich												
3 – Sandwich Industrial Estate	0	++	0	+	++	--	0?	--	++	--	-?	-?
3 – Sandwich Industrial Estate_r	0	+	0	+	+	-	0?	--	+	-	-?	-?
2 – Discovery Park_r <sup>36</sup>	0	+	0	+	+	-	0?	--	+	--	-?	0?
2 – Discovery Park_r	0	+	0	+	+	-	0?	--	+	--	-?	0?
2 – Discovery Park	0	+	0	+	+	--	0?	--	+	--	-?	0?
1 – Ramsgate Road	0	-	0	+	-	-	0?	--	-	--	-?	0?
Whitfield												

<sup>36</sup> Discovery Park is allocated in the Publication Local Plan but does not have a policy because it has outline planning permission. It is allocated for employment use under Strategic Policy 8 (Economic Growth) and forms part of the economic growth strategy.

Site ID	SA1: Housing	SA2: Health and well-being		SA3: Employment	SA4: Transport	SA5: Resources	SA6: Air pollution	SA7: Flood risk	SA8: Climate change	SA9: Biodiversity	SA10: Historic environment	SA11: Landscape
		SA2a: Access to amenities	SA2b: Health risk									
12 – Land to East of Sandwich Road	0	+	0	+	+	--	0?	--	+	-	-?	0?
20 – Port Zone	0	-	0	+	+	-	0?	--	+	--	-?	0?
7 – White Cliffs Business Park_r2	0	+	0	+	+	--	0?	--	+	--	-?	-?
7 – White Cliffs Business Park	0	+	0	+	+	--	0?	--	+	--	-?	-?
7 – White Cliffs Business Park_r	0	0	0	+	0	--	0?	--	0	-	-?	-?
<b>7 – White Cliffs Business Park_r3</b>	0	0	0	+	0	--	0?	--	0	--	-?	-?
Worth												
<b>TC4S076</b>	0	-	--	+	-	--	0?	0	-	--	0?	0?
13 – The Worth Centre	0	-	0	+	-	--	0?	--	-	--	-?	0?
<b>Key<sup>37</sup></b>	++ Significant positive effect likely		+ Minor positive effect likely		- Minor negative effect likely			-- Significant negative effect likely			0 Negligible effect likely	

<sup>37</sup> Suitable and potentially suitable Draft Local Plan site options discounted during the preparation of the Publication Local Plan are marked with an \*. Sites ending in an r represent previously appraised site options reappraised with revised site boundaries, either late in the preparation of the Draft Local Plan or during the preparation of the Publication Local Plan.

### Dover residential site option SA findings

**5.49** The Dover site options are generally found to perform considerably better against the SA framework than the Whitfield site options. This is largely because Whitfield is located farther away from the centre of the regional centre, away from the services and facilities concentrated in the town's centre. Notably strongly performing site options include DOV019 and DOV021 close to the centre of the town.

**5.50** The more remote sites are generally larger, covering expansive areas of more rural greenfield land where there is generally greater scope for significant adverse effects on the District's environment. For example, sites WHI001, WHI001r and WHI008 in the open countryside.

**5.51** Of the 47 site options within and around Dover (including Guston) and Whitfield, 20 have been allocated in the Publication Local Plan. The Council's reasoning for this is set out in **Appendix D**. 15 of the 24 most strongly performing site options have been selected for allocation: DOV019, TC4S026, DOV018r, DOV028, TC4S028, DOV017r2 res, 23r – Western Heights res, DOV022E, DOV030, DOV022Br, TC4S030, TC4S027r, DOV006, DOV022C and WHI008. Of the 23 weaker performing site options in and around Dover, five were selected for allocation: DOV008, DOV017r, DOV023, DOV026r and WHI001r.

**5.52** The overall number of site options referenced above reflects the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The changes to the site boundaries were made to better manage the issues and aspirations at each allocation and address considerations that have been raised by key stakeholders (e.g. available accessible routes into and out of certain sites). Similarly, several site options were resubmitted by site promoters in response to the Regulation 18 consultation with alternative boundaries. Amended site options have been appraised alongside their originals and other sites for comparison. They can be distinguished from their original counterparts through the addition of an 'r' at the end of the site reference.

### Deal residential site option SA findings

**5.53** The site options in closest proximity to Deal's centre perform (DEA018\*, TC4S047 and DEA021\*) better against the SA framework than larger site options located adjacent to the existing urban edges of the settlement. The weakest performing site options are located in generally the remotest locations south of Walmer (WAL002) and west of Sholden (DEA008) where there is generally greater scope for significant adverse effects on the District's environment. In addition, the sites to the west of Sholden (SHO002\* and SHO004\*) are noted to be in close proximity to the A258, which has the potential to generate noise issues for residents in the immediate vicinity, with adverse effects against SA objective 2 (health and well-being).

**5.54** Five of the eleven site options within and around Deal have been allocated in the Publication Local Plan. The Council's reasoning for this is set out in **Appendix D**. Three of the six strongest performing sites have been allocated: TC4S047, TC4S008 and TC4S032. Of the five weakest performing site options in and around Deal, two have been selected for allocation: DEA008 and WAL002.

**5.55** The overall number of site options referenced above reflects the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The amended site boundaries are marked 'r' at the end of the site reference.

### Aylesham and Sandwich residential site option SA findings

**5.56** Although the majority of the site options around both settlements cover large areas of open, greenfield land, increasing the potential for adverse effects on the District's environment in general, the Aylesham sites also overlap with greenfield land designated as Source Protection Zone and some of the District's best and most versatile agricultural land, resulting in potential for adverse effects against SA objective 5 (resources). The Sandwich site options generally have greater potential for flood risk issues, resulting in greater potential for significant adverse effects against SA objective 7 (flood risk), but more of the Sandwich sites, such as SAN006, SAN013, SAN007, SAN008, SAN015\*, SAN015r\* and SAN023, are in close proximity to local services and facilities. Notable exceptions to this include SAN019, SAN019r and SAN010, which perform relatively poorly against the SA framework, alongside Aylesham sites AYL002\*, ALY003, ALY003r, AYL003r2 and ALY004.

**5.57** Of the 21 site options within and around Aylesham and Sandwich, nine have been allocated in the Publication Local Plan. Seven of the top eleven most strongly performing site options have been selected for allocation: AYL001, SAN008, SAN004, SAN006, SAN013, SAN007 and SAN023. Of the ten remaining weakest performing site options in and around Aylesham and Sandwich, two were selected for allocation: ALY003r2 and SAN019r. The Council's reasoning for this is set out in **Appendix D**.

**5.58** The overall number of site options referenced above reflects the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The amended site boundaries are marked 'r' at the end of the site reference.

#### Local centre residential site option SA findings

**5.59** The vast majority of sites are in relatively rural locations, where there is generally poorer access to a good range of local services and facilities and the District's sustainable transport network. With the exception of the sites in and around the local centres of Elvington and Shepherdswell with Coldred, which generally perform better, there is no notable pattern with regards to which local centres have the strongest and weakest performing sites against the SA framework. Ash, Eastry, Elvington, Shepherdswell with Coldred and Wingham all have site options which perform relatively well and relatively poorly, where as the site options in Eythorne and St Margret's at Cliffe fall somewhere in between.

**5.60** The best performing site options are closest to the services and facilities within the local centres of Elvington and Shepherdswell with Coldred and are also likely to have relatively limited impacts on the District's natural resources and assets. Conversely, the weakest performing site options have greater potential for adverse effects against the District's natural resources (SA objective 5) and assets, specifically: sites overlapping with greenfield land designated as Source Protection Zone and best and most versatile agricultural land in and around Eastry, Shepherdswell with Coldred and Wingham; sites at greater risk of flooding in Eastry, Shepherdswell with Coldred and Ash (SA objective 7); and sites in closer proximity to recognised sensitive historic assets in St Margret's at Cliffe.

**5.61** Of the 45 site options within and around the District's local centres, 21 have been allocated in the Publication Local Plan across the settlements of Eastry, Elvington, Eythorne, Shepherdswell with Coldred, St Margret's at Cliffe and Wingham. 11 of the top 23 most strongly performing site options have been selected for allocation: SHE008, TC4S082, EYT008, SHE004r2, EYT003, EYT012, SHE013, EYT009, TC4S039r, WIN003 and STM010. Ten of the remaining 22 weakest performing site options in and around the local centres were selected for allocation: STM003, STM006, EAS002, TC4S023, SHE006, WIN004, STM007, STM008, WIN014 and EAS009. The Council's reasoning for this is set out in **Appendix D**.

**5.62** The overall number of site options referenced above reflects the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The amended site boundaries are marked 'r' at the end of the site reference.

#### Village residential site option SA findings

**5.63** Again, the sites are located in rural locations where there is generally poorer access to a good range of local services and facilities and the District's sustainable transport network. Alkham, Northbourne, Finglesham, Ringwould and Staple generally have relatively poor performing site options. The site options which perform the strongest against the SA framework are located in Nonington, Lydden, Kingsdown, West Hougham, Woodnesborough, Capel le Ferne, Great Mongeham, East Langdon, East Studdal, Preston, Chillenden, Tilmanstone and Worth. These sites are generally free from significant environmental constraints, although some have more significant environmental constraints tied to the presence of local natural resources: Source Protection Zone and good quality agricultural land (SA objective 5), in addition to flood risk (SA objective 7), for example LYD003/LYD003r.

**5.64** The weakest performing site options have greater potential for adverse effects against the District's natural hazards, resources and assets, specifically: sites overlapping with greenfield land designated as Source Protection Zone and good quality agricultural land (SA objective 5), areas of flood risk (SA objective 7), ecological assets (SA objective 9) and/or the historic environment (SA objective 10). Most of the Staple and Ringwoud sites are particularly isolated from local services and facilities. The Ringwoud site options (RIN002, RIN003\* and RIN004) are also in particularly close proximity to the A258, which has the potential to generate noise issues for residents in the immediate vicinity, with adverse effects against SA objective 2 (health and well-being).

**5.65** Of the 51 site options within and around the District's villages, 22 have been allocated in the Publication Local Plan across the settlements of Alkham, Capel le Ferne, Chillenden, East Langdon, Great Mongeham, Kingsdown, Lydden, Nonington, Preston, Ringwoud, Staple, Woodnesborough and Worth. 14 of the top 26 most strongly performing site options have been selected for allocation: LYD003r, TC4S074, KIN002, WOO005, CAP009, CAP013, GTM003, LAN003, NON006r, PRE003, PRE016, CAP006r, WOO006 and WOO009. Of the 25 remaining weakest performing site options in and around the villages, eight have been selected for allocation: ALK003, CAP011, PRE017, RIN002, RIN004, STA004, WOR006 and GOO006. The Council's reasoning for this is set out in **Appendix D**.

**5.66** The overall number of site options referenced above reflects the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The amended site boundaries are marked 'r' at the end of the site reference.

## Employment Site Option SA Findings

**5.67** The employment site options considered at both the Draft (Regulation 18) and Publication (Regulation 19) Local Plan stages are illustrated in **Figure 5.2**. These sites include new greenfield and brownfield sites as well as established employment sites potentially suitable for expansion and intensification.

**5.68** **Table 5.7** illustrates the effects of all the reasonable employment site options appraised.

**5.69** The employment sites are distributed across the District. The vast majority are located in and around Dover, although the largest single area lies to the north of Sandwich. The remaining site options are relatively small and are scattered in a handful of the other settlements, including some smaller villages.

**5.70** No single settlement's employment sites perform particularly better than any other. The best performing sites are located in particularly accessible locations, notably site 23r (Western Heights) in Dover, 11 (Albert Road) in Deal, 4 and 4r (Aylesham Development Area) in Aylesham and 3 (Sandwich Industrial Estate) in Sandwich, although some of these sites have the potential to have significant adverse effects on the ecology and/or landscape character of the District: sites 23, 11 and 3. The poorest performing sites are generally in more remote rural locations that are harder to access sustainably and are close to sensitive aspects of the local environment, notably sites 6 (Betteshanger Colliery) in Northbourne, 13 (The Worth Centre) in Worth, 24 (Eastry Hospital) in Eastry and 1 (Ramsgate Road) north of Sandwich.

**5.71** Despite some sites being located in relatively central locations with good access to the District's highway network, they still have the potential to adversely affect the local environment, such as sites TC4S092, 8 (Barwick Road Industrial Estate), 9 (Western Docks) and 18 (Dover Waterfront) in Dover. The Whitfield sites (7, 12 and 20) perform relatively moderately for similar reasons, although they are located farther out on the outskirts of Dover.

**5.72** Of the 41 site options within and around the District, nine have been allocated in the Publication Local Plan in and around various settlements in the District's settlement hierarchy. The intensification of other existing employment sites are supported through Policies E1 and E2 of the Plan:

- **Dover/Whitfield** – Of the 21 site options within and around Dover and Whitfield, five Dover sites and one Whitfield site have been allocated in the Publication Local Plan. Three of the eleven most strongly performing site options have been selected for allocation: 23r – Western Heights emp, 21 – Midtown\_r and DOV017r2 emp. Of the ten weaker performing sites, three in and around Dover have been selected for allocation: TC4S092 – Fort Burgoyne, 7 – White Cliffs Business Park\_r3 (incl. Phase 4) and 18 – Dover Waterfront. Of those sites not selected for allocation, three sites are existing



employment sites which will receive protection under Policy E2, including 8 – Barwick Road Industrial Estate, 17 – A20 Sites (incl. Megger Archcliffe Fort etc) and 20 - Port Zone, Whitfield.

- **Deal** – Of the three site options within and around Deal none have been allocated in the Publication Local Plan. However two of these are existing employment sites which will receive protection under Policy E2, namely 10- Deal Business Park and 11 – Albert Road, Deal.
- **Aylesham/Sandwich** – Of the four Aylesham sites and six Sandwich sites, two have been allocated in the Publication Local Plan: one in the top five best performing sites – Site 4 – Aylesham Development Area and one in the ten weakest performing sites – 14 – Land off Holt Street (Snowdown Colliery). Discovery Park is also allocated in the Publication Local Plan but does not have a policy. Of the sites not selected for allocation, four sites are existing employment sites and will receive protection under Policy E2, namely 1 – Ramsgate Road, Sandwich, 3 – Sandwich Industrial Estate, 19 – Aylesham Industrial Estate and TC4S114 – Land at Ratling Road, Aylesham.
- **Local centres** – The best performing sites are not selected for allocation, but one of the poorer performing sites, TC4S076 (Statenborough Farm), has been allocated.
- **Villages** – None of the four site options within and around the District’s villages have been allocated in the Publication Local Plan.

**5.73** The Council’s reasoning for this is set out in **Appendix D**.

**5.74** The overall number of site options referenced above is based on the fact that some of the site options were appraised more than once but with slightly different boundaries to the original. The amended site boundaries are marked ‘r’ at the end of the site reference.

## Gypsy and Traveller Site Option SA Findings

**5.75** Three reasonable gypsy and traveller site options have been identified by the Council and appraised through the SA: two in Alkham and one in Aylesham. The gypsy and traveller site options are illustrated in **Figure 5.1**, alongside the other residential site options.

**5.76** **Table 5.6** illustrates the effects of the three reasonable gypsy and traveller site options appraised. No gypsy and traveller sites have been allocated in the Publication Local Plan (Regulation 19) in favour of meeting future needs through existing gypsy and traveller site intensification. Consequently, the gypsy and traveller sites are not illustrated in **Figure 5.3**. However, it is acknowledged that one of the sites originally subjected to appraisal, TC4S044, is identified for intensification. TC4S044 was identified as a new site at the time of appraisal and has subsequently been granted consent. The effects of intensification within established gypsy and traveller sites are identified through the SA of the Publication Local Plan, specifically Housing Policy 3 (Meeting the needs of Gypsies and Travellers) in **Chapter 7**.

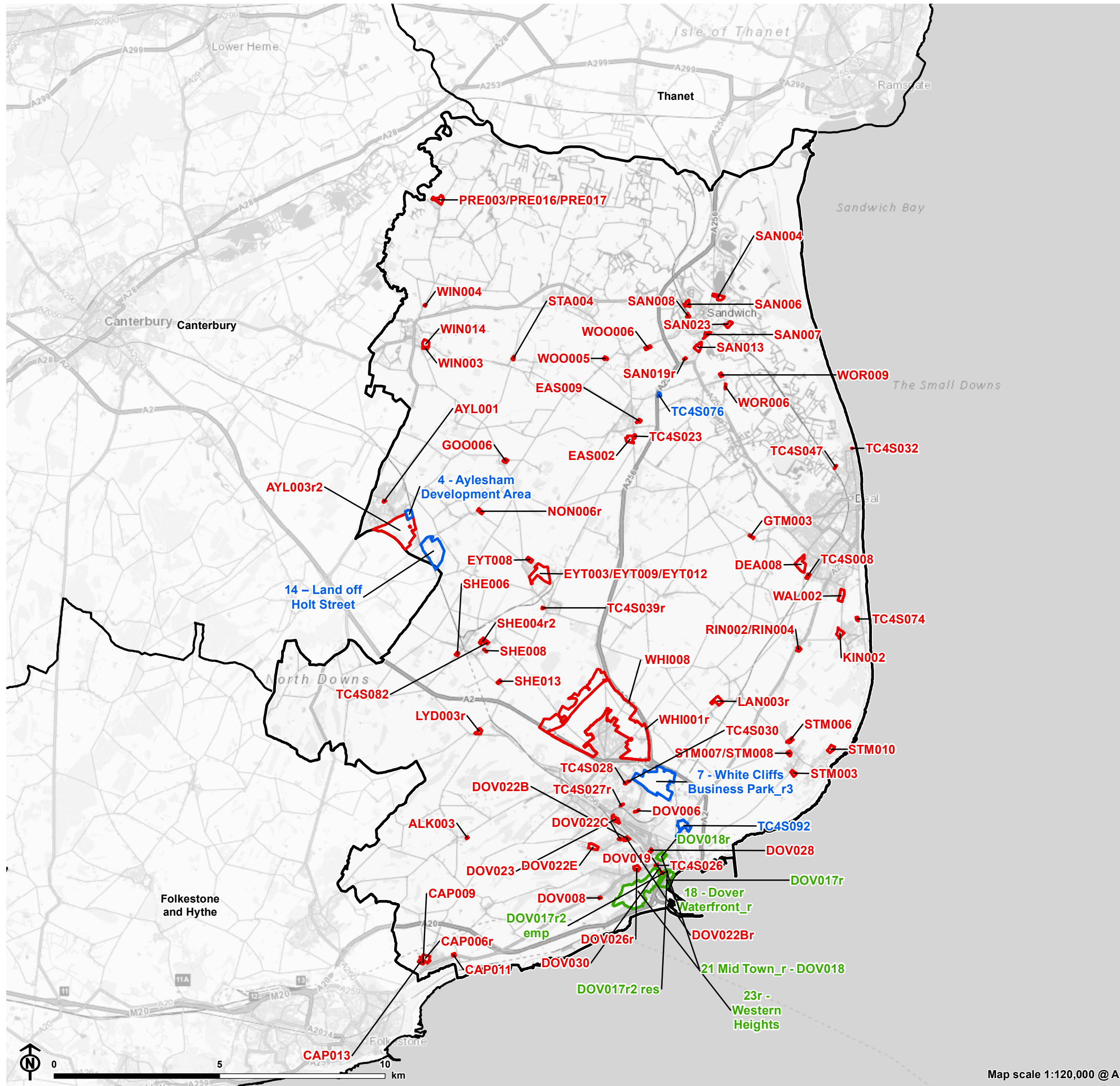
## Reasons for the Selection of the Preferred Growth and Spatial Strategy

**5.77** Following the SA of the reasonable growth and spatial options set out in **Chapter 4**, and the SA of the reasonable site options during the preparation of both the Draft (Regulation 18) and Publication (Regulation 19) Local Plans, the Council finalised its planned scale of growth and spatial strategy. The decision was made in light of the SA findings, the availability and suitability of the site options, Dover Local Plan’s wider evidence base and the views of stakeholders and the public.

**5.78** The preferred option represents a hybrid of Spatial Options A (Suitable Sites), C (Settlement Hierarchy) and D (Adopted Plan Dover Focus), delivering a scale of residential and employment growth closest to Growth Option 2 (Medium Growth). Delivering Growth Option 2 (the District’s residential development needs in combination with more economic land) through Spatial Options C (Settlement Hierarchy) and D (Adopted Plan Dover Focus) were found to represent the most sustainable scale and patterns of growth in the District in **Chapter 4**. Spatial Option A (Suitable Sites) was found to perform less well but reflects the location of suitable and available sites across the District, identified through the Council’s HELAA. Consequently, the notably high proportion of homes to be delivered on sites in Aylesham rather than Deal or Sandwich, and the greater proportion of homes being delivered through sites across the District’s larger better serviced rural settlements, represent the pattern of available and suitable sites in the District. Other notable factors include the District’s environmental constraints, such as the concentration of ecologically sensitive assets in the north and north east of the District.

**5.79**The location and boundaries of the preferred residential and employment sites are illustrated in **Figure 5.3. Appendix D** sets out the Council's reasons for the selection of specific sites for allocation in light of the reasonable alternatives identified.

Figure 5.3: Preferred Site Allocations



- District boundary
- Neighbouring district boundary
- Residential
- Employment
- Mixed

Map scale 1:120,000 @ A3

## Chapter 6

### Draft Local Plan Sustainability Appraisal (Reg 18)

**6.1** This chapter sets out and appraises the preferred contents of the Regulation 18 Draft Local Plan, which was published for consultation between January and March 2021. This chapter also includes the reasonable alternative options considered in the development of the Local Plan. The chapter reflects a point in time of the SA and Local Plan-making process and contains the bulk of the appraisal of reasonable alternatives to the final policies set out in the Publication Local Plan and appraised in **Chapter 7**.

**6.2** Please note that the policy references within this chapter reflect those contained within the Regulation 18 Draft Local Plan, and are different to those contained within the Regulation 19 Publication Local Plan, which are presented in **Chapter 7** of this report.

#### Outline of the Structure and Contents of the Draft Local Plan

**6.3** The Draft Local Plan set out Dover District Council's overarching vision and associated strategic objectives for Dover District up to 2040. The policies within the Draft Local Plan set out how this will be delivered, covering: climate change, new homes, employment and the local economy, retail and town centres, transport and infrastructure, design, the natural environment and the historic environment. Each element of the Plan is set out in further detail alongside its appraisal in the subsequent sections of **Chapter 6**.

**6.4** The policies plan to deliver the District's housing needs (a minimum of 10,998 new homes) and economic aspirations, maximising their benefits and managing their sensitivities to avoid and minimise adverse effects on the environment and the health and well-being.

**6.5** Housing growth is distributed across the District, with notable concentrations of allocations in the District's largest existing settlements, most notably Dover Town and neighbouring Whitfield. Other strategic housing allocations include large areas of land north and south of Aylesham and land in between Eythorne and Elvington.

**6.6** Employment growth is generally focussed within established employment sites distributed across the District, with notable concentrations in Dover and north of Sandwich.

#### Approach to the Appraisal of the Draft Local Plan

**6.7** The appraisals in this chapter are structured in the same way as the Draft Local Plan, taking each chapter containing appraisable options in turn. Each section starts with a summary of the scope of a Draft Local Plan chapter's contents. Consideration is then given to the options considered for each policy and their reasonableness. The reasonable options considered in the definition of each preferred policy are then appraised against the SA objectives in the SA framework, with a focus on identifying the likely variations in their significant effects. The Council's justification for the selection of the preferred options is included after each appraisal.

**6.8** The preferred contents of each chapter – the vision, strategic objectives, strategic policies, site allocation policies or development management policies – are then appraised against the SA framework, highlighting the significant effects of each preferred option in the chapter under each SA objective. A summary table illustrating the likely effects of all preferred options is provided for each chapter. Where appropriate, each section ends with a list of recommendations as to how significant negative effects could be avoided or mitigated and positive effects could be enhanced and/or uncertain effects removed.

**6.9** All alternative policy options have been identified through initial consultation and workshops, the Local Plan evidence base, relevant legislation and planning guidance and readings of other Local Plans, including the District's own adopted Core Strategy and Land Allocations Local Plan. The Draft Local Plan asks consultees if they agree with all the options identified and selected and requests information on other reasonable alternatives that have not been considered to date.

## Vision and Strategic Objectives

**6.10** The overarching vision for Dover District in 2040 is:

*‘Dover District in 2040 will be a place of aspiration, providing outstanding opportunities for sustainable living. Through careful stewardship of its world class landscapes and wealth of historic sites, it will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience. Community spirit will be strong amongst the residents of the District, with an increased sense of health and well-being.’*

**6.11** The overarching vision is supported by four other themed visions, used as a framework for 17 strategic objectives:

- **Prosperous Economy:** The local economy will be prosperous and diverse, harnessing the world class potential of Discovery Park and building upon key sectors of life sciences, pharmaceuticals, manufacturing and logistics, as well as local entrepreneurial talent. The District will have attracted new businesses of all scales, with 21<sup>st</sup> century infrastructure, unrivalled transport connections with London and Europe, alongside home working facilities. Dover will be a District that visitors want to spend time in, taking advantage of a diverse range of high-quality accommodation, attractions and unique experiences building upon the globally important Dover Castle and the iconic White Cliffs.
- **Vibrant Communities:** New developments will blend seamlessly with the existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District. New housing will enhance towns and villages, delivering a balanced and resilient housing market, a supply of new homes that meets people’s needs and where affordable and local housing is prioritised. Residents will have access to healthy lifestyle opportunities that the District’s high-quality countryside and maritime landscapes provide, including extensive and attractive public green spaces and an enhanced network of dedicated walking and cycling routes, as well as improved educational opportunities and leisure and community services.
- **Thriving Places:** Dover town will be thriving, with a strong core of local shops and services, a flourishing port, and regenerated areas of existing housing. Sensitive restoration of elements of its rich heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making. The distinctive historic environments of the towns of Deal and Sandwich will be protected and enhanced, their economies benefiting from a wide range of local businesses and services as well as investment in culture. The rural villages of the District will continue to enrich the landscapes here, with improved community facilities and housing opportunities, enabling more young people to stay and contribute to the communities where they grew up.
- **Spectacular and Sustainable Environment:** Above all, its enviable countryside and coastal environments will define the District. The climate change emergency will have delivered increased opportunities for local food production, extensive tree planting, and the adoption of sustainable design and construction methods. From the iconic White Cliffs to the nationally valued chalk downlands of the Kent Downs AONB, habitats will have been protected and enhanced. Air quality and biodiversity will have been improved, as the District achieves significant progress to becoming net zero carbon.

**6.12 Table 6.1** sets out the strategic objectives, as well as their relationship with the Vision Themes and policies within the Draft Local Plan.

**Table 6.1: Draft Local Plan vision themes and strategic objectives**

Vision Themes	Strategic Objectives	Relevant Draft Local Plan Policy Chapter
Prosperous Economy	To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.	Employment and Local Economy Transport and Infrastructure
	To support opportunities to strengthen the role of Dover, Deal and Sandwich Town Centres through their diversification, enhancement and improvements to the public realm.	

Vision Themes	Strategic Objectives	Relevant Draft Local Plan Policy Chapter
	To provide a range of high-quality tourism facilities and accommodation, which facilitate the growth of the tourism sector, and encourage longer staying visits.	
Vibrant Communities	To provide greater choice of high-quality housing to meet the needs of Dover District's growing population and changing demographic, and address affordability issues.	Housing Design Community Facilities Transport and Infrastructure
To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.		
To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which promote local distinctiveness and a sense of place.		
To provide new and improved community infrastructure and assets, including open space and sports facilities to meet the needs of the District's communities.		
Spectacular and Sustainable Environment	To respond to the challenges of climate change, ensuring new development is resilient to, and mitigates against the effects of climate change, including by reducing carbon emissions, and designing development that is resilient to the effects of climate change.	Climate Change Natural Environment
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.		
To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and their positive role in regeneration of the District.		
To conserve and enhance the District's biodiversity, including all designated wildlife sites and priority habitats and to enhance ecological connectivity between them, delivering a net gain in biodiversity.		
To conserve and enhance the District's important natural landscapes and water environments, to ensure these assets can continue to be experienced and valued by residents and visitors and are protected from inappropriate development.		
Cross Cutting Issues	To ensure the District's natural resources are used prudently, waste is minimised, and environmental pollution is reduced or avoided.	Transport and Infrastructure Natural Environment
To support improvements in the health and well-being of residents, improve quality of life for all and reduce health inequalities.		
To improve connectivity and movement through significantly enhancing the provision of sustainable modes of transport and delivering improvements to the local and strategic road network.		

Vision Themes	Strategic Objectives	Relevant Draft Local Plan Policy Chapter
	To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.	
	To work with the Council's partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District's people and places.	

### Reasonable alternatives SA

**6.13** The draft vision and strategic objectives have been informed by the Local Plan evidence base, the Council Corporate Plan and several Local Plan workshops held over the past two years and culminating the Virtual Visioning Event held on the 30<sup>th</sup> July 2020. The draft vision is considered to comprehensively cover the issues and aspirations collected, whilst remaining locally specific. Therefore, there were considered to be no reasonable alternatives at this stage.

### Draft vision and strategic objectives SA

**6.14 Table 6.2** sets out the likely effects of the Draft Local Plan vision and strategic objectives. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**6.15** The vision is likely to have a **significant positive** effect against this SA objective because it promotes the delivery of a diverse range of high quality accommodation that meets local needs, while prioritising affordability.

**6.16** The strategic objective promoting housing choice and affordability is also likely to generate a **significant positive** effect against this SA objective. Minor positive effects are also acknowledged because the majority of the other strategic objectives promote good place-making that will benefit existing and new residents, as well as the long-term resilience of the local housing market. Many of the strategic objectives promote higher-quality, more sustainable and attractive developments that contribute to and invest in local communities' services, facilities and infrastructure. Delivering all these requirements has the potential to reduce the affordability of new homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**6.17** The vision is likely to have a **significant positive** effect against this SA objective because it promotes the health and well-being of the District's resident's workers and visitors through: the safeguarding and enhancement of the District's natural and historic assets; regeneration and the diversification of the local economy and community services and facilities; high-quality design of development and public realm; the promotion of active and other sustainable forms of transport; and, recreation and climate change resilience.

**6.18** The majority of the strategic objectives are likely to generate **significant positive** effects against this SA objective because the majority of them promote investment in local facilities and services, including ecosystem services, and cultural and economic assets that will directly or indirectly improve the health and well-being of local residents, workers and visitors. The strategic objectives that are not considered likely to generate significant positive effects are still acknowledged to have the potential to generate indirect positive effects by virtue of their contribution to the District's economy and services.

#### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.19** The vision is likely to have a **significant positive** effect against this objective because it promotes a prosperous and diverse economy, strengthening the District's successful economic centres, sectors and tourist attractions, and investing in District's transport network and home working facilities.

**6.20** The strategic objectives promoting the growth and diversity of the economy and the growth of tourism are likely to generate a **significant positive** effect against this SA objective. Minor positive effects are also acknowledged because the majority of the other strategic objectives promote good place-making that will benefit existing and new workers and businesses, as well as the long-term resilience of the local economy. Many of the strategic objectives promote higher-quality, more sustainable and attractive developments that contribute to and invest in local communities' services, facilities and infrastructure. Delivering all these requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

#### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**6.21** The vision is likely to have a **significant positive** effect against this objective because it promotes the delivery of unrivalled transport connections with London and Europe, an enhanced network of dedicated walking and cycling routes and improved connections to the seafront.

**6.22** The strategic objectives focusing on the regeneration and investment in the connectivity, diversity and accessibility of the District's regional and local centres are likely to generate **significant positive** effects against this objective.

**6.23** Several of the other strategic objectives promoting climate change resilience, the improvement of community infrastructure, health and well-being and air pollution reduction are likely to generate indirect minor positive effects against this objective by virtue of the fact that all these causes will involve investment in and sustainable travel and traffic congestion alleviation. Mixed minor positive and minor negative effects are recorded in relation to the strategic objectives promoting the growth and diversification of the local economy and tourism because this will likely increase the amount of traffic on the District's roads but will also result in investment in the sustainable connectivity and accessibility of the District.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.24** The vision is likely to have a **significant positive** effect against this objective because it promotes the safeguarding of the District's natural environments and increase opportunities for local food production, tree planting and the adoption of sustainable design and construction methods.

**6.25** The strategic objectives focussed on the regeneration of the District's existing regional and local centres, including brownfield land, minimises resource use and safeguard the open countryside are likely to generate **significant positive** effects against his SA objective. Similarly, the strategic objectives that promote the protection of the District's natural environment, sustainable design and construction and investment in existing centres are considered to generate indirect minor positive effects against this objective.

**6.26** The strategic objectives that promote the growth and diversification of the District's economy and the delivery of homes have the potential to generate minor negative effects against this SA objective, given that the scale of growth required is likely to result in the loss of at least some greenfield land and its natural resources.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**6.27** The vision is likely to have a **significant positive** effect against this objective because it promotes health and well-being and air quality improvements.

**6.28** The strategic objective that promotes the minimisation of air pollution is likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and investment in existing centres and their sustainable and active transport connections and accessibility are considered to generate indirect minor positive effects against this objective.

**6.29** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the number of vehicles on the District's road network.



#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**6.30** The vision is likely to have a **significant positive** effect against this objective because it promotes extensive tree planting and sustainable design and construction methods.

**6.31** The strategic objectives that promote climate change adaptation and the management of local flood risk are likely to generate **significant positive** effects against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network and the health and well-being of residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**6.32** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the density of urban areas and increase the likelihood that some greenspace within and adjacent to established settlements will be lost to development.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**6.33** The vision is likely to have a **significant positive** effect against this objective because it promotes sustainable and active transport modes, sustainable design and construction methods and significant progress to becoming a net zero carbon District.

**6.34** The strategic objectives that promote climate change mitigation and the regeneration and investment in the District's existing regional and local centres, limiting the need for larger portions of the population to travel by road and increasing the viability of energy efficiency, low carbon and renewable energy schemes, are likely to generate **significant positive** effects against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network and the health and well-being of residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**6.35** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the consumption of water and fossil fuels in the District, at least in the short to medium term before the District realises its net zero carbon ambitions.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**6.36** The vision is likely to have a **significant positive** effect against this objective because it promotes the protection of the District's spectacular natural environments, including the protection and enhancement of its wildlife habitats.

**6.37** The strategic objective that promotes the protection and enhancement of the District's ecological assets is likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network, including wider natural landscapes are considered to generate indirect minor positive effects against this objective.

**6.38** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the disturbance of ecological assets, through potential increases in air, noise and water pollution, recreation pressures on established and vulnerable habitats and habitat loss where development occurs on greenfield land.

#### SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment

**6.39** The vision is likely to have a **significant positive** effect against this objective because it promotes the careful stewardship of the District's historic assets through the sensitive restoration of its rich heritage.

**6.40** The strategic objectives that promote high quality design that promote local distinctiveness and the conservation and enhancement of historic assets are likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the health and well-being of local residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**6.41** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes, including the potential densification of local regional and local centres have the potential to generate minor negative effects against this SA objective, given these activities are likely to be in close proximity to historic assets where there is potential to affect their significance and setting. It is however acknowledged that the regeneration of existing historic settlements, including their public realm may result in the positive effects too.

**6.42** The strategic objective promoting climate change mitigation is likely to result in increased investment in energy efficiency and low carbon and renewable technologies in historic settlements, including on and in close proximity to historic assets which may result minor adverse effects to their setting and/or significance, but will also help to secure their resilience to climate change in the long term.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.43** The vision is likely to have a **significant positive** effect against this objective because it promotes the protection of the District's spectacular natural environments, including world class landscapes, such as the iconic White Cliffs, chalk downlands and Kent Downs AONB.

**6.44** The strategic objectives that promote high quality design that promote the protection and enhancement of the District's landscapes, seascapes and local distinctiveness and the conservation and enhancement of historic assets are likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of green infrastructure in the urban and rural areas are considered to generate indirect minor positive effects against this objective.

**6.45** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes, including the potential densification of local regional and local centres have the potential to generate minor negative effects against this SA objective, given these activities have the potential to be within and in close proximity to sensitive landscapes and townscapes. It is however acknowledged that the regeneration of established centres may result in the positive effects too.

**6.46** The strategic objective promoting climate change mitigation is likely to result in increased investment in energy efficiency and low carbon and renewable technologies in existing urban areas and in the open countryside, which may result minor adverse effects to the District's landscapes and townscapes but will also help to secure their resilience to climate change in the long term.

Table 6.2: Likely effects of Draft Local Plan vision and strategic objectives

Vision and Strategic Objectives / SA Objectives	Vision	Strategic Objectives																
		Prosperous Economy			Vibrant Communities				Spectacular and Sustainable Environment					Cross-Cutting Issues				
		Grow and diversify economy	Improve town centres	Grow tourism	Promote housing choice and affordability	Regeneration and accessibility	Quality design	Improve community infrastructure	Mitigate and adapt to climate change	Reduce and manage flood risk	Conserve and enhance historic assets	Conserve and enhance biodiversity	Conserve and enhance landscapes/seascapes	Minimise resource use, waste and pollution	Improve health and well-being for all	Improve sustainable connectivity	Deliver infrastructure on time	Capture development value and minimise impact
SA1: Housing	++	0	+	-	++	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	+/-	+/-
SA2: Health and well-being	++	+	++	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++
SA3: Employment	++	++	+	++	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-
SA4: Transport	++	+/-	++	+/-	0	++	0	+	+	0	0	0	0	0	+	+	++	+
SA5: Resources	++	-	+	0	-	++	+	0	+	+	0	+	++	++	0	0	0	+
SA6: Air pollution	++	-	+/-	-	-	+	0	+	+	0	0	+	0	++	+	+/-	+	+
SA7: Flood risk	++	-	+/-	0	-	+	+	+	++	++	0	+	+	+	+	+	+	+
SA8: Climate change	++	-	++	-	-	+	+	0	++	0	0	+	+	+	+	++	+	+
SA9: Biodiversity	++	-	+	-	-	+	+	+/-	+	+	0	++	+	+	+	+	+	+
SA10: Historic environment	++	-	+/-	+/-	-	+/-	++	0	+/-	+	++	0	+	+	+	+	0	+
SA11: Landscape	++	-	+/-	+/-	-	+/-	++	0	+/-	+	++	+	++	+	+	+	0	+
<b>Key</b>	++ Significant positive effect likely			+ Minor positive effect likely				+/- Mixed minor effect likely				- Minor negative effect likely			0 Negligible effect likely			

## Vision and strategic objectives recommendations

**6.47** The SA finds the vision and strategic objectives of the Draft Local Plan to be suitably comprehensive and ambitious to generate the potential of the Local Plan to deliver significant positive effects against all SA objectives in the SA framework, whilst also minimising adverse effects. Therefore, no recommendations were made.

## Climate Change Policies

**6.48** The Council has drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define ten climate change policies in the Draft Local Plan:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 1: Reducing Carbon Emissions.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 3: Renewable and Low Carbon Energy.
- DM Policy 4: Sustainable Travel.
- DM Policy 5: Water Efficiency.
- DM Policy 6: Flood Risk.
- DM Policy 7: Surface Water Management.
- DM Policy 8: Coastal Change Management Areas.
- DM Policy 9: Tree Planting and Protection.

## Reasonable alternatives SA

**6.49** Before the definition of the preferred draft policies, consideration has been given to a range of policy options under each of the above climate change policy headers.

**6.50** The options considered and their reasonableness are reported under each climate change issue header below. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is included after each appraisal.

## Planning for climate change

**6.51** Dover District Council declared a climate change emergency on the 4<sup>th</sup> November 2020 and has committed to preparing a Climate Change Strategy and associated Action Plan. The Council also has an ambition to become a net zero carbon emitter by 2030 at the latest.

**6.52** Setting out clearly in a strategic policy what the climate emergency declaration means for the Local Plan and how it will be reflected in and shape all policies is therefore considered important, and not doing so unreasonable in light of the strategic objectives of the Draft Local Plan. Strategic Policy 1 (Planning for Climate Change) is appraised below alongside the other climate change policies.

## Reducing carbon emissions

**6.53** With regards to reducing the carbon emissions of residential developments, the following options have been considered in the drafting of DM Policy 1 (Reducing Carbon Emissions):

- a. **Adopt the lower Future Homes Standard:** a 20% reduction in carbon emissions compared to the current standard for an average home, delivered through very high fabric standards (typically with triple glazing and minimal heat loss from walls, ceilings and roofs).
- b. **Adopt the Government's preferred Future Homes Standard:** a 31% reduction in carbon emissions compared to the current standard, delivered through better fabric standards (typically double not triple glazing), the installation of clean electricity generation technology such as: photovoltaic panels; wind turbines; solar thermal panels; air or ground source heat pumps; anaerobic digestion; combined heat and power plants; and biomass boilers.
- c. **Require the full 2025 Future Homes Standard to be delivered now:** a 75-80% reduction in carbon emissions compared to the current standard.

- d. Consider a phased approach to the introduction of the 2025 Future Homes across the Plan period.
- e. Set an alternative local target for reducing carbon emissions, focussing on the use of a decentralised energy supply.
- f. Require all new homes to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund. This fund would be administered by the Council.
- g. Not set out the Council's preferred policy approach until the results of the Future Homes consultation are known, instead relying on the NPPF, PPG and the National Technical Standards when providing determining planning applications for development in the District.

6.54 All of the above options were considered reasonable at this stage and were therefore appraised against the SA framework.

6.55 With the exception of option g, which considers not having a local policy on carbon reduction and is therefore likely to have a negligible effect against all SA objectives, all the reasonable options are considered to generate **significant positive** effects against SA objective 8 (climate change); however, the options that require more substantial carbon reductions in the short term (options c and f, and potentially e) are likely to generate more significant positive effects against SA objective 8 (climate change).

6.56 The same options are likely to have indirect minor positive effects on all other SA objectives, which would all benefit from minimising and delaying the significant adverse effects of climate change in the long term. Similarly, the same options have the potential for some adverse effects against SA objectives 1 (housing) and 3 (employment) by virtue of the fact they require developers delivering homes and new business premises to spend more on energy efficiency and low carbon and renewable technologies. Again, the more substantial the carbon reductions in the short term (options c and f, and potentially e) the greater the likelihood of **significant negative** effects against SA objectives 1 (housing) and 3 (employment).

6.57 Finally, increased investment in energy efficiency and low carbon and renewable technologies in sensitive landscapes and townscapes, including on or around historic assets may result in adverse effects to their setting and/or significance, with negative effects against SA objectives 10 (historic environment) and 11 (landscape), although the appropriateness of certain measures is likely to influence their adoption in such locations so only minor negative effects are acknowledged against these SA objectives.

6.58 Overall, options c and f are likely to generate the most significant positive and negative effects against the SA framework. The same effects could be generated by option e, although this is more uncertain because this option does not prescribe a carbon reduction target. With the lowest carbon reduction target, option a is likely to generate the least significant effects, followed by option b and then option d.

#### **Council's reasons for selecting the preferred option**

6.59 In light of the reasonable alternatives considered and appraised, the Council selected option b. This is because it is the Government's preferred option, striking a balance between significant carbon reduction and higher build costs. Furthermore, the Government is also considering removing the ability for local planning authorities to set higher efficiency standards for homes. It is therefore considered prudent to adopt the Government's preferred option at this time.

6.60 With regards to reducing carbon emissions from non-residential development, the Council's adopted Core Strategy required the BREEAM 'very good' standard. This rating is given to the top 25% of buildings and is considered to represent advanced good practice in sustainability performance. Similar to the new residential target, this is considered to strike an appropriate balance between carbon reduction and higher build costs.

#### **Sustainable design and construction**

6.61 With regards to promoting sustainable design and construction in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to facilitate the delivery of sustainable design and construction.

- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.62** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.63** Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against any of the SA objectives; however, this is uncertain as it depends on the nature of the sustainable design and construction methods prescribed and enforced in the policy.

**6.64** A general, high-level local policy approach is more likely to generate minor positive effects against all the SA objectives in the SA framework. Similarly, the strength and breadth of the sustainable design and construction methods prescribed is equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). Again, this is because the more developers delivering homes and new business premises have to spend on sustainable design and construction technologies and techniques the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

**6.65** In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.66** The Council concluded that a sustainable design and construction policy in the Local Plan can make an important contribution to delivering the Council's target of achieving net zero carbon by 2050 and sustainable development more generally. Therefore, option a was selected.

#### **Renewable and low carbon energy**

**6.67** With regards to the promotion of renewable and low carbon energy technologies in the Local Plan, the Council considered there to be three broad options:

- a. Adopt a local approach to managing this issue and include a criteria based policy in the Plan to facilitate the delivery of local renewable and low carbon energy to reduce greenhouse emissions.
- b. Allocate sites in the Local Plan to deliver renewable and low carbon energy schemes. For example, the KCC Renewable Energy Action Plan for Kent (2013) identifies the central areas of Dover District as having a high potential for large scale installation of onshore wind energy generation.
- c. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.68** The omission of a local policy on this issue (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.69** Adopting a local approach (either criteria-based or area-based) to promote the adoption of renewable and low carbon energy generation technologies has the potential to generate **significant positive** effects against SA objective 8 (climate change). It also has the potential to create new local jobs associated with the local construction and maintenance of installed renewable and low carbon technologies with at least minor positive effects against SA objective 3 (employment). The significance of these positive effects is uncertain as it depends on the strength on the policy wording, specifically how much energy should be generated by such technologies and where.

**6.70** A general, high-level local criteria or area-based policy approach is more likely to generate minor positive effects against SA objectives 3 (employment) and 8 (climate change). Similarly, the strength of the policy is equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 3 (employment). Again, this is because the more developers delivering homes and new business premises have to spend on such technologies the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

**6.71** In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

**6.72** Requiring or at least encouraging the development of renewable and low carbon technologies across the District has the potential to generate **significant negative** effects against SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape), depending on the location, design and scale of the technologies developed. This is because certain technologies can generate air, noise and or light pollution, increase the prevalence of bird-strike or affect the setting and special character of the District's sensitive historic assets and landscapes. However, a criteria-based policy offers the flexibility to encourage the development of renewable and low carbon technologies anywhere in the District subject to necessary environmental and health safeguards, encouraging wide-ranging adoption.

**6.73** Alternatively, an areas-based policy offers greater opportunity to delineate the locations in the District where renewable and low carbon energy yields are likely to be greatest and with the least impact on the local environment and the health and well-being of local residents, offering greater to certainty to developers.

**6.74** Consequently, both options have the potential to generate **significant positive** effects against SA objective 8 (climate change) and minimise associated adverse effects against SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape) for different reasons. A combined approach, containing both criteria and area-based elements would therefore be likely to generate the most significant positive effects and greatest level of flexibility and certainty for developers.

#### **Council's reasons for selecting the preferred option**

**6.75** Acknowledging the important contribution renewable and low carbon energy generation could make to the District, and wider country's zero carbon ambitions, the Council considered a local policy on renewable and low carbon energy to assist in the delivery of this target.

**6.76** In the absence of detailed evidence identifying area-based opportunities for a broad range of renewable and low carbon energy technologies, a criteria-based policy approach setting out clear principles that each development will need to consider was preferred. Therefore, option a was selected.

#### **Sustainable travel**

**6.77** With regards to promoting sustainable travel in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to ensure that new development provides the opportunity to maximise the use of the sustainable transport modes of walking, cycling, and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport.
- b. Specify individual sustainable transport measures to be delivered within each site allocation.
- c. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.78** The omission of a local policy on this issue (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.79** Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against SA objectives 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change), and minor positive effects in relation to SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape). The significance of these effects are uncertain until the nature of the sustainable transport modes and methods prescribed and enforced in a given policy are known.

**6.80** A general, high-level local policy approach (option a) or more site specific policy requirements (option b) are more likely to generate minor positive effects against all the SA objectives in the SA framework, with the potential exception of SA objectives 4 (transport) and 8 (climate change), against which the benefits are still likely to be significant. Similarly, the strength and breadth of the sustainable transport methods prescribed is equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 3 (employment). Again, this is because the more developers delivering homes and new business premises have to spend on sustainable travel technologies and techniques the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

**6.81** In the absence of any firm details on the likely nature and breadth of a such local planning policy, minor negative effects are recorded against these two SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.82** The Council concluded that a sustainable travel policy in the Local Plan can make an important contribution to delivering the Council's target of achieving net zero carbon by 2050 and sustainable development more generally. Furthermore, the alternative (option c) was considered to provide an insufficient level of guidance for applicants and officers. Therefore, option a was selected.

#### **Water efficiency**

**6.83** With regards to the promotion of water efficiency in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a maximum usage standard of 110 litres/person/day.
- b. Rely on the minimum standard in the National Technical Standards and Building Regulations of 125 litres/person/day.

**6.84** Reliance on the minimum national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by National Technical Standards and Building Regulations.

**6.85** Adopting the more stringent water efficiency standard in a local policy has the potential to generate **significant positive** effects against SA objectives 5 (resources) and 7 (flood risk), and minor positive effects against SA objectives 2 (health and well-being) and 9 (biodiversity) by virtue of the fact that more of the District's precious water reserves will be left in situ as the climate continues to become drier in the summer months, to maintain local habitats and wildlife populations and safeguarded more water for the health and well-being of the District's residents, workers and visitors. Although a more stringent water efficiency policy will require developers delivering homes and new business premises to spend more, the additional cost of meeting this compared to the National Technical Standard is considered to be relatively minor. Therefore, no negative effects are recorded against the SA objectives in the SA framework.

#### **Council's reasons for selecting the preferred option**

**6.86** Given the overwhelming evidence that Dover is in an area of water stress and is likely to become more stressed as the effects of climate change are more fully realised, the more stringent policy option (option a) was preferred.

#### **Flood risk**

**6.87** With regards to managing flood risk in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to ensure that new development provides the opportunity to ensure that flood risk and coastal change is managed effectively and sustainably as part of the planning process.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.88** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.89** Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against SA objective 7 (flood risk), and minor positive effects in relation to SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape). The significance of these effects is uncertain until the nature of the measures to avoid and mitigate flood risk are prescribed in a draft policy.

**6.90** A general, high-level local policy approach is more likely to generate minor positive effects against SA objective 7 (flood risk).



### **Council's reasons for selecting the preferred option**

**6.91** Drawing on the Strategic Flood Risk Assessment (2019) which highlights a number of areas in the District at risk of flooding from a variety of different sources, option a was considered most appropriate, allowing the Council to effectively manage this issue at a local level through the policies in the Local Plan. Therefore, option a was selected.

### **Surface water management**

**6.92** With regards to surface water management in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to ensure that new development provides the opportunity to ensure that surface water is managed effectively and sustainably as part of the planning process.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.93** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.94** Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against SA objective 7 (flood risk), and minor positive effects in relation to SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape). The significance of these effects is uncertain until the nature of the measures to avoid and mitigate surface water flooding are prescribed in a draft policy. A general, high-level local policy approach is more likely to generate minor positive effects against SA objective 7 (flood risk).

### **Council's reasons for selecting the preferred option**

**6.95** Drawing on the Strategic Flood Risk Assessment (2019) which highlights a number of areas in the District at risk of flooding from a variety of different sources, option a was considered most appropriate, allowing the Council to effectively manage this issue at a local level through the policies in the Local Plan. Therefore, option a was selected.

### **Coastal change management areas**

**6.96** With regards to coastal change management in the Local Plan, the Council considers there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to ensure that new development provides the opportunity to ensure that coastal change is managed effectively and sustainably as part of the planning process.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.97** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.98** Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against SA objective 7 (flood risk), and minor positive effects in relation to SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape). The significance of these effects is uncertain until the nature of the measures to manage coastal change are prescribed in a draft policy.

**6.99** A general, high-level local policy approach is more likely to generate minor positive effects against SA objective 7 (flood risk).

### **Council's reasons for selecting the preferred option**

**6.100** Drawing on the Strategic Flood Risk Assessment (2019) which highlights a number of areas in the District affected by coastal change, option a was considered most appropriate, allowing the Council to effectively manage this issue at a local level through the policies in the Local Plan. Therefore, option a was selected.

## Carbon Sequestration

**6.101** With regards to the promotion of carbon sequestration in the Local Plan, the Council considered there to be two broad options:

- a. Adopt a local approach to managing this issue and include a policy in the Local Plan to facilitate the delivery of more trees to sequester carbon from the atmosphere to help address climate change.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.102** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.103** Adopting a local policy promoting carbon sequestration and climate change adaptation through tree planting has the potential to generate **significant positive** effects against SA objectives 2 (health and well-being), 5 (resources), 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape), acknowledging the wide range of ecosystem services that mature trees provide to the natural environment and the health and well-being of residents, workers and visitors. These effects are uncertain as it depends on the nature and scale of the tree planting and protection prescribed and enforced in the policy.

**6.104** A general, high-level local policy approach is more likely to generate minor positive effects against the same SA objectives in the SA framework. Similarly, the strength and breadth of the tree planting and protection prescribed is equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 3 (employment). Again, this is because the more developers delivering homes and new business premises have to spend on tree planting and the protection of existing trees the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

**6.105** In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

### Council's reasons for selecting the preferred option

**6.106** Tree planting is widely recognised as an effective way to achieve carbon neutrality and deliver other important ecosystem services efficiency, including effective climate change adaptation. Therefore, the Council elected to include a policy in the Local Plan to facilitate tree planting and tree protection in line with option a.

## Climate change policies SA

**6.107** **Table 6.3** sets out the likely effects of the Draft Local Plan climate change policies. The reasoning for the identification of these likely effects is set out by SA objective below.

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**6.108** The climate change policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge the policies' promotion of good place-making that will benefit existing and new residents, as well as the long-term resilience of the local housing market. The policies also promote higher-quality, more sustainable and attractive developments that contribute to and invest in local infrastructure. Delivering all these requirements has the potential to reduce the affordability of new homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**6.109** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 4: Sustainable Travel.

- DM Policy 6: Flood Risk.
- DM Policy 7: Surface Water Management.
- DM Policy 8: Coastal Change Management Areas.

**6.110** This is because these policies focus on protecting the local population from the potential significant health risks associated with flooding. Furthermore, Strategic Policy 1 (Planning for Climate Change) and DM Policy 4 (Sustainable Travel) encourage sustainable and active travel, which contribute to health lifestyles, help to minimise the number of private vehicles on the road and the air and noise pollution they create.

**6.111** The remaining climate change policies promote investment in technologies and infrastructure that will directly or indirectly improve the health and well-being of local residents, workers and visitors, notably through the cooling and heating of buildings, reductions in energy bills for residents and businesses. Improving the District's green infrastructure network will also contribute to mitigating air pollution, urban cooling and the mental health of the District's population.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.112** The climate change policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge the policies' promotion of good place-making that will benefit existing and new businesses and workers, as well as the long-term resilience of the local economy. The policies also promote higher-quality, more sustainable and attractive developments that contribute to and invest in local infrastructure. Delivering all these requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**6.113** Strategic Policy 1 (Planning for Climate Change) and DM Policy 4 (Sustainable Travel) are likely to generate **significant positive** effects against this objective because they encourage sustainable and active travel, which will contribute to reducing the need to travel by private vehicle and reduce road congestion. DM Policy 3 (Renewable and Low Carbon Energy) in acknowledgement of the fact that the policy encourages the increased construction of renewable and low carbon technologies, which have the potential to generate significant levels of construction traffic; however, the policy requires that their development minimise impact on the local transport network, so only a minor negative effect is recorded against this SA objective.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**6.114** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 5: Water Efficiency.
- DM Policy 8: Coastal Change Management Areas.
- DM Policy 9: Tree Planting and Protection.

**6.115** This is because these policies are focussed on the protection of the District's water supply and quality and/or sustainable design and construction practices that minimise resource use and impact on natural resources and protect and expand the District's tree coverage. Minor positive effects are recorded for DM Policy 6 (Flood Risk) and DM Policy 7 (Surface Water Management), both of which also contribute to the protection of the District's natural resources by minimising destructive flooding and the surface water run-off with the potential to pollute local habitats and water supplies.

**6.116** A mixed minor positive and negative effect is recorded for DM Policy 3 (Renewable and Low Carbon Energy) in acknowledgement of the fact that largescale installations have the potential to generate minor negative effects through the loss of at least some greenfield land and its natural resources. The minor positive effect recognises that renewable and low carbon energy sources minimise the need to use fossil fuels and can be generated from waste.

#### SA 6: To reduce air pollution and ensure air quality continues to improve

**6.117** The following climate change policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 1: Reducing Carbon Emissions.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 3: Renewable and Low Carbon Energy.
- DM Policy 4: Sustainable Travel.
- DM Policy 9: Tree Planting and Protection.

**6.118** This is because these policies reduce the need for the District to burn fossil fuels to travel and heat and power businesses and homes, which are the primary sources of air pollution in the District. DM Policy 9 (Tree Planting and Protection) contributes by encouraging the planting of new trees which are known to help reduce and disperse air pollution.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**6.119** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 5: Water Efficiency.
- DM Policy 6: Flood Risk.
- DM Policy 7: Surface Water Management.
- DM Policy 8: Coastal Change Management Areas.
- DM Policy 9: Tree Planting and Protection.

**6.120** This is because these policies directly promote climate change adaptation through sustainable design and construction practices, the management of local flood risk and the expansion and enhancement of the District's green infrastructure network.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**6.121** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 1: Reducing Carbon Emissions.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 3: Renewable and Low Carbon Energy.
- DM Policy 4: Sustainable Travel.
- DM Policy 5: Water Efficiency.
- DM Policy 9: Tree Planting and Protection.

**6.122** This is because these policies directly promote climate change mitigation through the promotion of sustainable design and construction practices, energy efficiency, renewable and low carbon technologies and sustainable and low carbon travel practices.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**6.123** Strategic Policy 1 (Planning for Climate Change) and DM Policy 9 (Tree Planting and Protection) both focus on the expansion and enhancement of the District's green infrastructure network, which has the potential to have **significant positive** effects against this SA objective. With the exception of DM Policy 1 (Reducing Carbon Emission), which is considered to have a negligible effect on this SA objective (at least within the Plan period) and DM Policy 3 (Renewable and Low Carbon Energy), the remaining climate change policies are considered to have a minor positive effect on this SA objective by virtue of the fact that they indirectly promote or protect biodiversity through the promotion of sustainable design and construction practices, sustainable transport (reducing air and noise pollution) and water supply, quality and flood risk management.

**6.124** DM Policy 3 (Renewable and Low Carbon Energy) has the potential to have a minor negative effect on this SA objective. Although the policy requires that renewable and low carbon energy proposals do not have a significant impact on habitats, biodiversity or wildlife, such developments have the potential to result in the loss or disturbance of wildlife and habitats. However, the policy also requires proposals to conserve and enhance the natural environment through measures such as biodiversity off-setting, so a minor positive effect is also recorded.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.125** With the exception of DM Policy 5 (Water Efficiency) and 10 (Tree Planting and Protection), all the climate change policies have the potential to generate minor positive effects on this SA objective. This is because the policies promote sustainable design and construction, which is considered to generate indirect minor positive effects against this objective, by improving the climate change resilience of historic assets across the District.

**6.126** With the exception of DM Policy 3 (Renewable and Low Carbon Energy) which requires such proposals to have no adverse impact on historic assets, the climate change policies that promote climate change mitigation are likely to result in increased investment in energy efficiency technologies in historic settlements, including on and in close proximity to historic assets which may result in adverse effects to their setting and/or significance. Therefore, the following climate change policies have the potential for mixed minor positive and minor negative effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 1: Reducing Carbon Emissions.
- DM Policy 2: Sustainable Design and Construction.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.127** DM Policy 9 (Tree Planting and Protection) has the potential to generate a **significant positive** effect against this SA objective by virtue of the fact that it promotes the protection and planting of more trees throughout the District, directly helping to protect and enhance the District's landscapes and townscapes.

**6.128** The remaining climate change policies have the potential to generate minor positive effect against this SA objective through the promotion of sustainable design and construction, flood protection and sustainable water management and the protection and enhancement of green infrastructure in the urban and rural areas. These policies not only safeguard and enhance the District's landscapes and townscapes in the short term but help to ensure they are climate change resilient in the medium to long term.

**6.129** The climate change policies promoting climate change mitigation are likely to result in increased investment in energy efficiency and low carbon and renewable technologies in existing urban areas and in the open countryside, which may result in minor adverse effects to the District's landscapes and townscapes. Therefore, the following climate change policies have the potential for mixed minor positive and minor negative effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- DM Policy 1: Reducing Carbon Emissions.
- DM Policy 2: Sustainable Design and Construction.
- DM Policy 3: Renewable and Low Carbon Energy.

Table 6.3: Likely effects of Draft Local Plan climate change policies

Climate Change Policies / SA Objectives	Strategic Policy 1: Planning for Climate Change	DM Policy 1: Reducing Carbon Emissions	DM Policy 2: Sustainable Design and Construction	DM Policy 3: Renewable and Low Carbon Energy	DM Policy 4: Sustainable Travel	DM Policy 5: Water Efficiency	DM Policy 6: Flood Risk	DM Policy 7: Surface Water Management	DM Policy 8: Coastal Change Management Areas	DM Policy 9: Tree Planting and Protection
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and well-being	++	+	+	+	++	+	++	++	++	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	++	0	0	-	++	0	0	0	0	0
SA5: Resources	++	0	++	+/-	0	++	+	+	++	++
SA6: Air pollution	+	+	+	+	+	0	0	0	0	+
SA7: Flood risk	++	0	++	0	0	++	++	++	++	++
SA8: Climate change	++	++	++	++	++	++	0	0	0	++
SA9: Biodiversity	++	0	+	+/-	+	+	+	+	+	++
SA10: Historic environment	+/-	+/-	+/-	0	+	0	+	+	+	0
SA11: Landscape	+/-	+/-	+/-	-	+	+	+	+	+	++
<b>Key</b>	++ Significant positive effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		- Minor negative effect likely		0 Negligible effect likely	

### Climate change policy recommendations

**6.130** The SA generally finds the climate change policies of the Draft Local Plan to deliver significant positive effects against most of the SA objectives, and their focus on climate change issues limits their potential to generate significant positive effects against the other SA objectives.

**6.131** Requiring developers to design in climate change mitigation and adaptation measures into development proposals will generally increase the cost of development and may, in certain locations, prohibit development or undermine the viability of projects, with adverse effects against SA objectives 1 (housing) and 3 (employment). However, the addition of policy wording promoting climate change mitigation and adaptation measures subject to the viability of development would undermine the purpose of the climate change policies and the significant positive effect the policies generate across the SA framework. Therefore, no further policy wording is recommended to avoid or mitigate the potential for minor adverse effects against SA objectives 1 (housing) and 3 (employment).

**6.132** Strategic Policy 1 (Planning for Climate Change), DM Policy 1 (Reducing Carbon Emissions), DM Policy 2 (Sustainable Design and Construction) and DM Policy 3 (Renewable and Low Carbon Energy) have the potential to generate minor negative effects against SA objectives 4 (travel), 5 (resources), 9 (biodiversity), 10 (historic environment) or 11 (landscape).

**6.133** In acknowledgement of these potential minor negative effects, the Council considered adding additional policy wording to these policies to require that climate change mitigation measures should avoid any adverse impacts on some (if not all) of the following District's assets: the transport network, natural resources, biodiverse habitats and wildlife, historic environment and landscapes and townscapes.

**6.134** It was concluded that such policy wording could further call into question the viability and/or deliverability of certain developments with further adverse, and potentially significant, effects against SA objectives 1 (housing) and 3 (employment).

**6.135** The Council considered that an appropriate balance has been struck between the two. Furthermore, other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

### New Homes Policies

**6.136** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define 16 new homes policies in the Draft Local Plan:

- Strategic Policy 2: Housing Growth.
- Strategic Policy 3: Residential Windfall Development.
- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- DM Policy 10: Gypsy and Traveller Site Intensification.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.
- DM Policy 11: Type and Mix of Housing.
- DM Policy 12: Affordable Housing.
- DM Policy 13: Rural Local Needs Housing.
- DM Policy 14: Gypsy and Traveller Windfall Accommodation.
- DM Policy 15: Self and Custom Build Housing.
- DM Policy 16: Residential Extensions and Annexes.
- DM Policy 17: Houses in Multiple Occupation.

### Reasonable alternatives SA

**6.137** Before the definition of the preferred draft policies, consideration has been given to a range of policy options under each of the above new homes policy headers.

**6.138** The options considered and their reasonableness are reported under each new homes issue header below. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is included after each appraisal.

### Housing growth

**6.139** In order to identify the Council's preferred housing growth strategy, consideration has been given to how many homes should be planned for and where should they go. Two potential scales of housing have been considered for accommodation within the Plan period:

- a. **Growth Option 1<sup>38</sup>**: Lowest growth scenario – meeting the minimum objectively assessed needs of the District: 8,700 new homes<sup>39</sup>.
- b. **Growth Option 3<sup>40</sup>**: Highest growth scenario – maximising the residential growth potential of the District by allocating all suitable and potentially suitable housing land, with a total capacity of 12,111 homes.

**6.140** Five potential geographical distributions of housing have been considered:

- a. **Spatial Option A**: Distributing growth to the District's suitable and potentially suitable housing site options (as needed to deliver the scale of growth required<sup>41</sup>).
- b. **Spatial Option B**: Distributing growth proportionately amongst the District's existing settlements based on their population.
- c. **Spatial Option C**: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- d. **Spatial Option D**: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- e. **Spatial Option E**: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

**6.141** All potential combinations of the reasonable growth and spatial options are appraised in **Chapter 4**. Other growth and spatial options were considered but were discounted as unreasonable. Justification for why these other options were deemed to be unreasonable can also be found in **Chapter 4**.

### Council's reasons for selecting the preferred option

**6.142** Following the SA of the options, the Council elected to pursue:

- The minimum objectively assessed housing needs of the District in line with Growth Options 1 or 2. This approach is considered to be consistent with the guidance set out in the Strategic Housing Market Assessment (2017) which concludes that a cautious approach is needed to the housing target unless significant economic interventions, such as regeneration, are secured. Furthermore, it acknowledges the considerable environmental constraints covering large areas of the District.
- A spatial strategy guided by the District's settlement hierarchy (Spatial Option C) but also avoiding the District's key environmental constraints (Spatial Option D). To ensure deliverability the spatial strategy is also influenced by site availability (Spatial Option A).

### Residential windfall development

**6.143** With regards to managing residential windfall development, the adopted residential windfall development policy restricts development to settlements with defined settlement boundaries on the Local Plan Proposals Map. This policy approach was

<sup>38</sup> Growth Option 2 contains the same scale of potential housing development to Growth Option 1, but a different scale of potential employment land development.

<sup>39</sup> Note: the figures referred to in the Draft Local Plan include a 10% buffer and exclude committed development and windfall allowances.

<sup>40</sup> Growth Option 3 includes a different scale of potential employment land development than Growth Option 1.

<sup>41</sup> Suitable sites prioritised over potentially suitable sites for growth option 1.



developed under previous national policy and is now considered overly restrictive having regard to the guidance set down in the NPPF and NPPG. The option of continuing with the current policy approach is therefore not considered to be reasonable.

**6.144** Other reasonable residential windfall policy options considered for the Draft Local Plan include:

- a. Supporting the principle of windfall development within established settlements where it can be demonstrated windfall sites support existing services and facilities and existing services and facilities can accommodate them. Furthermore, the design of windfall development must be of a particularly high standard, reflective of the character and setting of the settlement.
- b. Supporting the principle of windfall development within established settlements and immediately adjoining settlement boundaries.

**6.145** Both options a and b are likely to facilitate the delivery of a modest number of additional homes over and above those allocated within the Draft Local Plan with minor positive effects against SA objective 1 (housing). Option b, however, offers the possibility of locating such development at the edge of existing settlements as well as within them. Whilst this option has the potential to apply to more site options than option a (focussed within settlements), increasing the likely minor positive effect against SA objective 1 (housing), it also has greater potential to result in more adverse effects against some of the environmental SA objectives, notably SA objectives 5 (resources), 9 (biodiversity) and 11 (landscape). This is because there is greater scope for loss of greenfield land at settlement edges than within them. Given general small scale of windfall sites these adverse effects are acknowledged to be minor.

#### **Council's reasons for selecting the preferred option**

**6.146** In light of the reasonable alternatives considered and appraised, the Council elected to adopt a combination of options a and b, considering windfall development within and immediately adjoining the larger most sustainable settlements. However, windfall development at villages, will only be supported within their existing confines to better protect their character.

#### **Housing allocations**

**6.147** All reasonable housing site options considered for allocation in the Draft Local Plan are appraised in **Chapter 5**.

#### **Council's reasons for selecting the preferred option**

**6.148** Justification for the selection of site allocations included in the Draft Local Plan can be found in Appendix E of the SA Report accompanying the Draft Local Plan. In summary, site selection was informed by the findings of the District's Housing and Employment Land Availability Assessment (HELAA), the Sustainability Appraisal of the reasonable site options and further evidence, such as the highways modelling and engagement with ward members and town and parish Councillors. Sites have been selected in accordance with the Council's preferred option for the distribution of housing growth (as set out above), as well as the suitability, availability and achievability of individual site options.

#### **Gypsy and traveller growth – existing site intensification, windfall sites and new sites**

**6.149** In order to identify the Council's preferred gypsy and traveller strategy, consideration has been given to how many pitches should be planned for and where should they go. The following potential scales have been considered for accommodation within the Plan period:

- a. Identify site allocations to meet only the traveller site need identified in the Council's Gypsy and Traveller Accommodation Assessment (GTAA).
- b. Identify site allocations to meet traveller site need and cultural need identified in the Council's GTAA.
- c. Identify site allocations to deliver more pitches than the traveller site needs and cultural need identified in the GTAA.
- d. Identify site allocations to deliver fewer pitches than the traveller site needs and cultural need identified in the GTAA.
- e. Rely on windfall planning consents to address travellers' needs established in the GTAA.

**6.150** Options b-c have the potential to generate **significant positive** effects against SA objectives 1 (housing) and 2 (health and well-being) by virtue of the fact that these options meet the cultural and pitch needs of the District's gypsy and traveller community over the Plan period.

**6.151** Option c would deliver more than required, potentially contributing to the needs of neighbouring authorities, with further positive effects against SA objective 1 (housing) and 2 (health and well-being) compared to option b.

**6.152** Option a aims to only deliver the District's pitch needs, rather than meet the broader cultural needs of the community. Therefore, option a is only considered to generate a minor positive effect against SA objective 1 (housing) and 2 (health and well-being).

**6.153** Option e relies on meeting the District's gypsy and traveller needs through windfall consents, offering less certainty that needs will be met in the Plan period. An uncertain minor negative effect is therefore recorded for this option against SA objective 1 (housing) and 2 (health and well-being).

**6.154** Option d plans to deliver fewer pitches than has been identified as needs resulting in the potential for **significant negative** effects against SA objective 1 (housing) and 2 (health and well-being).

**6.155** The greater the number of pitches allocated and developed within the Plan period, the greater the potential for adverse effects on the District's environment; however, given the relatively small number of pitches required to meet local needs, negligible effects are recorded against all other SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.156** The Council elected to identify enough sites to meet the cultural and pitch need identified in the GTAA because it most effectively meets the needs of the local gypsy and traveller community. Furthermore, failure to identify and plan for a policy and legislative compliant Gypsy and Traveller Accommodation need, may increase the risk of unauthorized encampments and appeal challenges to planning applications for pitches in non-policy compliant locations within the District.

**6.157** The reasonable gypsy and traveller site options considered for allocation in the Draft Local Plan are appraised in **Chapter 5**. Justification for the selection of site allocations in the Draft Local Plan is included in Appendix E of the SA Report accompanying the Draft Local Plan.

#### **Type and mix of housing**

**6.158** With regards to managing the type and mix of residential development delivered through the Plan period, the following options have been considered:

- a. Require the type and mix of housing delivered meets the local need identified through the latest local evidence.
- b. Use nationally produced age and type of household projections from the Office for National Statistics to determine the appropriate type and mix of homes to be built within the District.
- c. Allow the type and mix of homes to be determined by the housing market and have no specific policy requirement.

**6.159** Option a represents the most locally tailored approach to the provision of housing type and mix and is therefore most likely to facilitate what is needed where more accurately than the options b and c, which rely on national statistics and the market, respectively. Therefore a **significant positive** effect is recorded against SA objective 1 (housing) and 2 (health and well-being) for option a.

**6.160** A more minor positive effect is recorded for the same SA objectives for option b, in acknowledgement of the fact that the option is still focussed on meeting the needs of all sections of the local community, but is just less likely to be as accurate as option a.

**6.161** Option c relies solely on the market, which may result in some sections of the local community not being catered for with **significant negative effects** against SA objectives 1 (housing) and 2 (health and well-being).

#### **Council's reasons for selecting the preferred option**

**6.162** Given the NPPF requires that the needs of the differing community groups in the community should be assessed and reflected in planning policy, the Council elected to include a policy on the type and mix of housing that should be built based on the latest local evidence of demographic need within the District (option a).

### Affordable and local needs housing

**6.163** The District's Whole Plan Viability Study completed by HDH Planning & Development alongside the preparation of the Draft Local Plan (2020) concludes that it is unviable to require affordable housing in the Dover urban area and recommends a 30% requirement for development of 10 dwellings or more elsewhere, with the exception of within the AONB where the 30% requirement applies to developments of 6 dwellings or more. Developers unable to meet the 30% requirement outside of Dover would be required to provide justification through an independently assessed viability study. Criteria will be provided to outline where flexibility could be made if viability is demonstrated to be an issue for delivery of the 30% affordable housing requirement.

**6.164** Paragraph 77 of the NPPF also requires local plans to include policies in relation to local needs housing. The equivalent policy in the adopted Local Plan is considered appropriate to roll forward, with the addition of criteria in relation to design, which is considered necessary to ensure development meets the design standards set out in the design policies, and to meet the requirements of the NPPF and national guidance in that respect.

**6.165** Such affordable housing and local needs housing policies are likely to have **significant positive** effects against SA objectives 1 (housing) and 2 (health and well-being), although the unviability of affordable housing in Dover Town also generates the potential for **significant negative** effects against SA objective 1 (housing).

### Council's reasons for selecting the preferred option

**6.166** No other alternatives were identified, and the above options were taken forward and appraised in the new homes policies SA section below.

### Self and custom build housing

**6.167** At present, the Council has an identified need for 4 plots on part 1 and 3 plots on part 2 of its register documenting the local need and capability to deliver self and custom build housing. However, legislation only requires the Council to consider the need as identified on part 1 of the register. With this in mind the Council has considered the following options for defining the scale of self and custom build housing in the Local Plan:

- a. Allocate specific sites to meet the established need under register 1 of the Council's self-build and custom housing register: four plots.
- b. Go beyond meeting the statutory need and allocate specific sites to meet the established need under registers 1 and 2 of the Council's self-build and custom housing register: seven plots.
- c. Rely on windfall planning consents to address the plot need established in the Council's self-build and custom housing register.

**6.168** Options a and b meet the minimum and maximum self-build and custom build needs, respectively. Given the relatively small number of these homes that are required, both are recorded as having a minor positive effect on SA objective 1 (housing), although it is acknowledged that option b is likely to be more positive given its commitment to deliver more homes.

**6.169** A minor negative effect is recorded for option c against SA objective 1 (housing) in acknowledgement of the fact that this option offers the least certainty that self-build and custom build needs will be delivered.

**6.170** In addition to identifying the need and potential for self-build and custom house growth, the register helps to inform the locations and scales of self-build and custom build development. The following options have been considered by the Council:

- a. Allow the housing market to determine plot provision through windfall consented planning applications.
- b. Plan for plots as prescribed by the Council's Self-build and Custom House building register.
- c. Allocate site(s) where land has been made available to meet the plot need.

**6.171** Option a relies solely on the market, which is likely to introduce more uncertainty into whether the need for self-build and custom build homes are met. Given the relatively small number of these homes required, this is only considered to have a minor positive effect against SA objective 1 (housing).

**6.172** Options b and c are more specific and are therefore likely to increase the certainty of the delivery of self-build and custom build homes. Minor positive effects are therefore recorded for SA objective 1 (housing) for these options.

### **Council's reasons for selecting the preferred option**

**6.173** Due to the relatively low number of plots on the register, the Council's preferred option was to include a specific windfall policy for self-build and custom house building to assist in the delivery of self and custom build housing. By not placing an undue requirement on specific site allocations to provide for a level of self-build and custom house building need that is not established, those sites will be less constrained in delivering other types of identified housing need. Furthermore, no sites deemed suitable for self-build and custom build have been identified through the Council's Housing and Economic Land Availability Assessment (HELAA).

### **Residential extensions and annexes**

**6.174** With regards to residential extensions and annexes, the Council considered there to be two broad options for the Local Plan:

- a. A local approach to managing this issue and include a policy in the Plan to facilitate the delivery of residential extensions and annexes.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.175** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance. Adopting a local approach to the management of this issue has the potential to generate minor positive effects against SA objectives 1 (housing), 2 (health and well-being) and 3 (employment).

### **Council's reasons for selecting the preferred option**

**6.176** In recognition of the District's ageing population and the influence of the COVID-19 pandemic on home-working practices, demand for such development is likely to continue through the Plan period. Therefore, the preferred approach was to include a policy to assist in the delivery of residential extensions and annexes.

### **Houses in multiple occupation**

**6.177** With regards to houses in multiple occupation (HMO), the Council considered there to be two broad options for the Local Plan:

- a. A specific criteria based policy in the Plan to manage HMOs and their impacts on communities.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.178** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.179** Adopting a local approach to the management of this issue has the potential to generate minor positive effects against SA objectives 1 (housing) and 2 (health and well-being).

### **Council's reasons for selecting the preferred option**

**6.180** Having considered the evidence, SA findings and opportunities and policy context within Dover, the preferred approach was to include a criteria based policy to manage HMOs and their impacts. This is considered to represent the most appropriate method for setting out a set of clear principles that each application will need to consider and will assist in the effective management of development in the District.

**6.181** In some cases, the creation of HMOs does not require planning permission, if it is a change for an existing C3 dwelling house to a small HMO (C4 – where between three and six unrelated people share communal facilities). It is possible for the Council to serve an Article 4 direction to require such changes of use to require planning permission. The Council will need to consider whether there is sufficient evidence that the impact of such changes of use warrant controlling through these means.

## New homes policies SA

**6.182** Table 6.4 sets out the likely effects of the Draft Local Plan new homes policies. The reasoning for the identification of these likely effects is set out by SA objective below.

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**6.183** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs over the Plan period and is therefore likely to generate a **significant positive** effect against this SA objective. The majority of the other housing policies also have the potential to generate **significant positive** effects against this SA objective, for the significant number of homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- DM Policy 10: Gypsy and Traveller Site Intensification.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.
- DM Policy 11: Type and Mix of Housing.
- DM Policy 12: Affordable Housing.
- DM Policy 13: Rural Local Needs Housing.
- DM Policy 15: Self and Custom Build Housing.
- DM Policy 16: Residential Extensions and Annexes.
- DM Policy 17: Houses in Multiple Occupation.

**6.184** The significant positive effect for DM Policy 12 (Affordable Housing) is coupled with the potential for a **significant negative** effect in acknowledgement of the fact that the policy does not require the delivery of affordable homes in the District's largest settlement: Dover. Therefore, in Dover, there is a risk that not everyone will be able to access an affordable home.

**6.185** Minor positive effects are recorded for the following policies:

- Strategic Policy 3: Residential Windfall Development.
- DM Policy 14: Gypsy and Traveller Windfall Accommodation.
- DM Policy 15: Self and Custom Build Housing.

**6.186** This is in acknowledgement of the valuable contribution non-allocated housing delivery can make to the District's housing need, albeit at relatively smaller scales. A mixed minor positive and minor negative effect is recorded for DM Policy 15 (Self and Custom Build Housing) in acknowledgement of the fact that the policy does not specify the specific type and locations such housing will be delivered. However, despite there being a relatively small need for self and custom build homes in the District, there is the possibility that needs will not be met within the Plan period.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**6.187** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective. However, a significant number of homes (1,875) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed significant positive and minor negative effect overall.

**6.188** The four strategic site allocations are also likely to generate **significant positive** effects against this SA objective:

- Strategic Policy 4: Whitfield Urban Expansion.

- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.

**6.189** This is because all four strategic housing allocations plan on delivering new local services and facilities at the centre of the new communities they create, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network. In the case of Strategic Policy 4 (Whitfield Urban Expansion) and Strategic Policy 7 (Eythorne and Elvington Local Centre) both significant positive effects are coupled with minor negative effects. This is because both allocations are located farther away from a good range of existing local services and facilities and sustainable transport options in the District, meaning the significant numbers of new residents concentrated in these locations are likely to have to travel farther afield for services and facilities not provided on site.

**6.190** Furthermore, Strategic Policy 4 (Whitfield Urban Expansion) is located between two strategic roads known to generate significant amounts of noise. New homes in close proximity to this noisy infrastructure has the potential to have an adverse effect on the health and well-being of new residents. However, the adopted Whitfield Masterplan which is in the process of being updated aims to limit the density of homes within the immediate vicinity of the roads and plant trees along the road edges to screen and soften the noise impacts.

**6.191** A mixed minor positive and minor negative effect is recorded for Strategic Policy 2 (Housing Allocations), covering the remaining smaller housing development sites to be allocated in the Draft Local Plan. This is in acknowledgement of the broad range of locations covered by the allocations listed in the policy, including sites in relatively accessible locations and sites in relatively remote and inaccessible locations.

**6.192** Furthermore, several of the sites are located within the immediate vicinity of busy roads and/or railway lines, the noise impacts from which will need to be adequately minimised.

**6.193** One site (WIN014) is located in relatively close proximity to a local sewage treatment works, resulting in the potential need to implement measures to reduce the adverse effects of the odours emanating from the works.

**6.194** One site (NOR005) is located in close proximity to a 'mine entry' recorded by the Coal Authority, offering scope for health and safety risks which require further investigation.

**6.195** A **significant negative** effect is recorded for Site Allocations Policy 2 (Land to the South of Alkham Valley Rd/ Land to the rear of The, Meadows Alkham). The gypsy and traveller site allocation does not enjoy easy access to a good range of local services and facilities, and its limited size limits the potential to invest in the creation of new services and facilities, including a range sustainable transport modes, closer by.

**6.196** **Significant positive** effects are recorded for the following policies:

- DM Policy 10: Gypsy and Traveller Intensification.
- DM Policy 11: Type and Mix of Housing.
- DM Policy 12: Affordable Housing.
- DM Policy 13: Rural Local Needs Housing.

**6.197** This is in acknowledgement of the important role delivering these various types of local housing needs have on the health and well-being of the District's local population. The significant positive effect for DM Policy 12 (Affordable Housing) is coupled with the potential for minor negative effect in acknowledgement of the fact that the policy does not require the delivery of affordable homes in the District's largest settlement: Dover. Therefore, in Dover, there is a risk that not everyone will be able to access an affordable home.

**6.198** Strategic Policy 3 (Residential Windfall Development) requires development not to have a significant impact on the living conditions of adjoining residents, allowing scope for some adverse effects. A minor adverse effect is therefore recorded for this policy.

**6.199** A minor positive effect is expected for the following policies against this objective:

- DM Policy 15: Self and Custom Build Housing.
- DM Policy 16: Residential Extensions and Annexes.
- DM Policy 17: Houses in Multiple Occupation.

**6.200** This is acknowledgement of valuable contribution some of the less common forms of housing need can make to the health and well-being of the specific portions of the District's population that need and/or want them, helping provide everyone with somewhere to live.

**6.201** A minor negative effect is also recorded for DM Policy 15 (Self and Custom Build Housing) in acknowledgement of the fact that the policy does not specify the specific type and locations such housing will be delivered. Despite there being a relatively small need for self and custom build homes in the District, there is the possibility that needs will not be met within the Plan period, which may have an adverse effect on the well-being of those that need/want them.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.202** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective. However, a significant number of homes (1,875) are also to be delivered in relatively rural areas where good accessibility to a wide range of employment opportunities is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available, resulting in a mixed significant positive and minor negative effect overall.

**6.203** The following six housing site policies have the potential to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.

**6.204** The minor positive effects recorded for Site Allocations Policy 1 (Housing Allocations) and Site Allocations Policy 2 (Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham) are coupled with minor negative effects. This is in acknowledgement that some site allocations are located in relatively remote locations, farther from sustainably accessible job opportunities.

**6.205** A minor positive effect is expected for DM Policy 16 (Residential Extensions and Annexes) against this objective, as the policy supports the development of extensions and annexes, which will allow people to create space for home working.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**6.206** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective by contributing to minimising the need for people to travel and alleviating traffic congestion through the diversification of sustainable transport options. However, a significant number of homes (1,875) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed significant positive and minor negative effect overall.

**6.207** Strategic Policy 6 (South Aylesham) and Strategic Policy 7 (Eythorne and Elvington Local Centre) are considered likely to generate **significant positive** effects against this SA objective. This is because both policies plan to deliver new local services and facilities at the centre of the new communities they create, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network. Furthermore, both locations already have relatively good access to existing local rail and bus services. Strategic Policy 5 (North Aylesham) includes plans for similar

investment in new local services and facilities but is in the relatively less accessible (via public transport modes) northern part of the settlement, resulting in more limited minor positive effects against this SA objective.

**6.208** Strategic Policy 4 (Whitfield Urban Expansion) and Site Allocations Policy 1 (Housing Allocations) are considered likely to generate mixed minor positive and minor negative effects against this SA objective. The positive effect acknowledges that the majority of allocations will contribute to the delivery of new and improved infrastructure and local services and facilities, all of which will contribute to minimising the need to travel by private car. Furthermore, Site Allocations Policy 1 (Housing Allocations), includes sites in relatively accessible locations. However, both of these sets of allocations contain sites located farther away from a good range of existing local services and facilities and sustainable transport options in the District, meaning that significant numbers of new residents are likely to have to travel farther afield for services and facilities not provided on site, and most likely by private car.

**6.209** A minor negative effect is recorded for Site Allocations Policy 2 (Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham). The gypsy and traveller site allocation does not enjoy access to a good range of local services and facilities, and its limited size limits the potential to invest in the creation of new services and facilities, including a range sustainable transport modes, closer by. Therefore, people travel to and from the site are most likely to travel by private vehicles, contributing the general congestion of the District's road network. Given the relatively small size of the site, this is likely to be a relatively minor contribution.

**6.210** A minor positive effect is expected for Strategic Policy 3 (Residential Windfall Development) and DM Policy 16 (Residential Extensions and Annexes) against this objective. Both policies require demonstration that traffic generated from the development can be safely accommodated on the local road network. Strategic Policy 3 (Residential Windfall Development) also focusses such development within and in the immediate vicinity of existing settlements where there is greater, more sustainable access to local services and facilities limiting the need to travel by private car. DM Policy 16 (Residential Extensions and Annexes) also offers greater scope for residents to work from home of set-up home businesses, reducing the need for commuting and its associated impact on road congestion at peak times.

**6.211** DM Policy 14 (Gypsy and Traveller Windfall Accommodation) is expected to have a mixed minor positive and minor negative effect against this objective. This is in acknowledgment of the policy's requirement for gypsy and traveller windfall development to be accessible to schools, health and local services, which will minimise travel distance, but the policy also prioritises road access, promoting use of private vehicles.

**6.212** Minor negative effects are recorded for DM Policy 13 (Rural Local Needs Housing) and DM Policy 17 (Houses in Multiple Occupation). DM Policy 13 (Rural Local Needs Housing) allows local needs housing schemes in rural areas, which could be hard to access and rely on private vehicles to access employment, services and facilities. The road network may also not be able to meet the additional demand. DM Policy 17 (Houses in Multiple Occupation) prohibits unacceptably harmful impacts on highway safety and increases in on street parking, implying that some adverse effects may be acceptable.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.213 Significant negative** effects are recorded for Strategic Policy 2 (Housing Growth) and the six housing site policies:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.

**6.214** This is in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. Furthermore, a significant proportion of the housing allocations sit within areas safeguarded for future mineral extraction. The allocations' development through the Plan period will result in the loss of these valuable and irreplaceable natural resources.



#### SA 6: To reduce air pollution and ensure air quality continues to improve

**6.215** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective by contributing to minimising the need for people to travel and alleviating traffic congestion and associated air pollution through the diversification of sustainable transport options. However, a significant number of homes (1,875) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective.

**6.216** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed significant positive and minor negative effect overall.

**6.217** The Council's Air Quality Study identifies the preferred site allocations that have the potential to adversely affect the District's air quality on notably sensitive transport corridors and junctions. Allocated sites with the potential to have a slight or moderate adverse effect the levels NO<sub>2</sub> and/or PM<sub>10</sub> in sensitively areas include the previously allocated site WHI008 covered under Strategy Policy 4 (Whitfield Urban Expansion) and sites DOV017r, DOV018r, DOV023, EYT001, GUS002, LYD003 and WIB014 allocated in Site Allocation Policy 1 (Housing Allocations). Therefore, these policies have the potential to generate a minor negative effect against this SA objective. The remaining sites and policies record a negligible effect.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**6.218** Minor adverse effects are recorded for the two residential policies that cover the broadest area of greenfield land in the District, specifically Strategic Policy 2 (Housing Growth) and Site Allocations Policy 1 (Housing Allocations). This is in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land and vegetation performing an important cooling and water sequestration role. The loss of this land to development will generally increase the likelihood of surface water flooding and extreme heat in the developed parts of the District. A significant proportion of the site allocations are located on land with the potential for surface water flooding, the risk of which is likely to increase with their development. The acknowledged incorporation of green infrastructure and sustainable urban drainage systems within such developments is considered to mitigate the significance of these adverse effects to minor negative effects.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**6.219** The housing growth and spatial strategy set out in Strategic Policy 2 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective, by virtue of the fact the spatial strategy aims to strike a sustainable balance that minimises the need for new communities to travel privately via unsustainable modes of transport. However, a significant number of homes (1,875) are also to be delivered in relatively rural areas where good accessibility to a wide range of employment opportunities is less readily available, resulting in the potential for some adverse effects against this SA objective.

**6.220** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available, resulting in a mixed significant positive and minor negative effect overall.

**6.221** The four strategic housing site policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.

**6.222** Despite being in a location with relatively poor sustainable transport links, the size of the allocation set out in Strategic Policy 4 (Whitfield Urban Expansion) offers the opportunity to invest in significant energy efficiency, renewable and low carbon energy measures. The adopted Whitfield Masterplan contains plans for a central energy centre for the allocation's decentralised

energy network. Furthermore, measures are being put in place to improve sustainable transport linked between the allocation and Dover to the south.

**6.223** Strategic Policy 5 (North Aylesham), Strategic Policy 6 (South Aylesham) and Strategic Policy 7 (Eythorne and Elvington Local Centre) have relatively good access to existing public transport services and include plans to significantly improve the range of local services and facilities, helping to reduce the need for the new communities they create to travel by private vehicles.

**6.224** A minor positive effect is recorded for Site Allocations Policy 1 (Housing Allocations) in acknowledgement that many of these small allocations are in sustainable locations with a range of sustainable travel options. However, the allocations' relatively smaller sizes offer less scope to take advantage of economies of scale to develop homes that deliver improvements in energy efficiency and other renewable and low carbon energy technologies that deliver carbon reductions significantly over and above national building regulation requirements.

**6.225** Site Allocations Policy 1 (Housing Allocations) and Site Allocations Policy 2 (Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham) record minor negative effects against this SA objective. Many of these site allocations are located in relatively remote locations, far from sustainably accessible local services and facilities and job opportunities, resulting in greater need to travel by private vehicles – one of the primary sources of greenhouse gas emissions in the District.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**6.226** Precautionary uncertain **significant negative** effects are recorded for Strategic Policy 2 (Housing Growth) and the six housing site policies:

- Strategic Policy 3: Residential Windfall Development.
- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.

**6.227** This is in acknowledgement of the findings of the Habitats Regulations Assessment (HRA) of the Draft Local Plan. The HRA concludes that adverse effects on the integrity of local European sites cannot be ruled out until further information is provided, and where necessary appropriate mitigation measures are put in place, to rule out water quality effects. This is because some site allocations are located on greenfield land and in close proximity to sensitive ecological habitats. Several of the allocations are located in close proximity to European Sites and/or Sites of Special Scientific Interest (SSSIs) and fall within their Impact Risk Zones defined by Natural England. Site allocation NOR005 contains land falling within the Sandwich Bay and Hacklinge Marshes SSSI. Others lie in close proximity to recognised priority habitats, ancient woodland and/or local wildlife sites. Although the allocations generally make reference to the need to avoid the loss of and protect designated assets within allocations, there is still potential to affect the integrity of habitats directly or indirectly in close proximity, from a range of sources through for example recreation disturbance or poorer air quality.

**6.228** Strategic site allocation policies Strategic Policy 4 (Whitfield Urban Expansion), Strategic Policy 5 (North Aylesham), Strategic Policy 6 (South Aylesham) and Strategic Policy 7 (Eythorne and Elvington Local Centre) set out requirements for notable enhancement to ecological assets and green infrastructure within and in the immediate vicinity of development, resulting in the potential for minor positive effects against this SA objective for these policies. Therefore, all four of these policies also record a minor positive effect against this SA objective, resulting in mixed minor positive and minor negative effects overall.

**6.229** Although the HRA does not identify potential for Site Allocations Policy 2 (Land to the South of Alkham Valley Rd) to adversely affect the integrity of European sites, the site does lie in close proximity to local ecological assets. Therefore, a minor negative effect is recorded against this SA objective.

**6.230** A minor negative effect is expected for the following policies against this objective:

- Strategic Policy 3: Residential Windfall Development.
- DM Policy 13: Rural Local Needs Housing.
- DM Policy 15: Self and Custom Build Housing.
- DM Policy 17: Houses in Multiple Occupation.

**6.231** Strategic Policy 3 (Residential Windfall Development) and DM Policy 14 (Gypsy and Traveller Windfall Accommodation) require windfall development does not result in significant harm to the character of an area, which implies that more minor negative effects on ecological assets may be acceptable. DM Policy 15 (Self-build and Custom House Building) requires highly sustainable development in keeping with the character of the environment but does not rule out the potential for harm to local ecology. DM Policy 17 (Houses in Multiple Occupation) does not contain policy wording that safeguards local ecological assets from the specific impacts of residential development designed for multiple occupation, but the policy does not permit development that would result in a significant adverse impact on visual amenity.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.232** Minor adverse effects are recorded for Strategic Policy 2 (Housing Growth) and the six housing site policies:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.

**6.233** This is in acknowledgement of the fact that many of the site allocations are located in close proximity to known historic assets or within historic landscapes or townscapes. Although the allocations generally make reference to the need for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly.

**6.234** The four strategic housing site policies all require the protection and enhancement of the historic assets within and in the immediate vicinity of their allocation boundaries:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.

**6.235** Therefore, all four of these policies also record a minor positive effect against this SA objective, resulting in mixed minor positive and minor negative effects overall.

**6.236** A minor negative effect is expected for the following policies against this objective:

- Strategic Policy 3: Residential Windfall Development.
- DM Policy 13: Rural Local Needs Housing.
- DM Policy 14: Gypsy and Traveller Windfall Accommodation.
- DM Policy 15: Self and Custom Build Housing.
- DM Policy 17: Houses in Multiple Occupation.

**6.237** Strategic Policy 3 (Residential Windfall Development) and DM Policy 14 (Gypsy and Traveller Windfall Accommodation) require windfall development does not result in significant harm to the character of an area, which implies that more minor negative effects on the historic environment may be acceptable. DM Policy 15 (Self-build and Custom House Building) requires highly sustainable development in keeping with the character of the environment but does not rule out the potential for harm to the local historic environment. DM Policy 17 (Houses in Multiple Occupation) does not contain policy wording that safeguards the local historic environment from residential development designed for multiple occupation, but the policy does not permit development that would result in a significant adverse impact on visual amenity.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.238** Minor adverse effects are recorded for Strategic Policy 2 (Housing Growth) and the six housing site policies:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.

- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.
- Site Allocations Policy 1: Housing Allocations.
- Site Allocations Policy 2: Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham.

**6.239** This is in acknowledgement of the fact that many of the site allocations are located in close proximity to known sensitive landscapes or townscapes. Although the allocations generally make reference to the need for appropriate landscaping and screening measures, particularly for views to and from the AONB, the wide extent of development and significant loss of openness in certain parts of the District's countryside means there is still potential to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly.

**6.240** The four strategic housing site policies all require the protection and enhancement of the landscapes that surround them, including sensitive landscaping and planting:

- Strategic Policy 4: Whitfield Urban Expansion.
- Strategic Policy 5: North Aylesham.
- Strategic Policy 6: South Aylesham.
- Strategic Policy 7: Eythorne and Elvington Local Centre.

**6.241** Therefore, all four of these policies also record a minor positive effect against this SA objective, resulting in mixed minor positive and minor negative effects overall.

**6.242** A minor negative effect is expected for the following policies against this objective:

- Strategic Policy 3: Residential Windfall Development.
- DM Policy 13: Rural Local Needs Housing.
- DM Policy 14: Gypsy and Traveller Windfall Accommodation.
- DM Policy 15: Self and Custom Build Housing.
- DM Policy 17: Houses in Multiple Occupation.

**6.243** Strategic Policy 3 (Residential Windfall Development) and DM Policy 14 (Gypsy and Traveller Windfall Accommodation) require windfall development does not result in significant harm to the character of an area, which implies that more minor negative effects on local landscape and townscape character may be acceptable. DM Policy 15 (Self-build and Custom House Building) requires highly sustainable development in keeping with the character of the environment but does not rule out the potential for harm to local landscape and townscape character.

**6.244** DM Policy 17 (Houses in Multiple Occupation) does not contain policy wording that safeguards local landscape and townscape character from the specific impacts of residential development designed for multiple occupation, but the policy does not permit development that would result in a significant adverse impact on visual amenity.

Table 6.4: Likely effects of Draft Local Plan new homes policies

New Homes Policies / SA Objectives	Strategic Policy 2: Housing Growth	Strategic Policy 3: Residential Windfall Development	Strategic Policy 4: Whitfield Urban Expansion	Strategic Policy 5: North Aylesham	Strategic Policy 6: South Aylesham	Strategic Policy 7: Eythorne and Evington Local Centre	Site Allocations Policy 1: Housing Allocations	DM Policy 10: Gypsy and Traveller Site Intensification	Site Allocations Policy 2: Land off Alkham Valley Road/To the Rear of The, Meadows	DM Policy 11: Type and Mix of Housing	DM Policy 12: Affordable Housing	DM Policy 13: Rural Local Needs Housing	DM Policy 14: Gypsy and Traveller Windfall Accommodation	DM Policy 15: Self and Custom Build Housing	DM Policy 16: Residential Extensions and Annexes	DM Policy 17: Houses in Multiple Occupation
SA1: Housing	++	+	++	++	++	++	++	++	++	++	++/-	++	+	+/-	++	++
SA2: Health and well-being	++/-	-	++/-	++	++	++/-	+/-	++	--	++	++/-	++	+	+/-	+	+
SA3: Employment	++/-	0	+	+	+	+	+/-	0	+/-	0	0	0	0	0	+	0
SA4: Transport	++/-	+	+/-	+	++	++	+/-	0	-	0	0	-	+/-	0	+	-
SA5: Resources	--	0	--	--	--	--	--	0	--	0	0	0	0	0	0	0
SA6: Air pollution	++/-	0	-	0	0	0	-	0	0	0	0	0	0	0	0	0
SA7: Flood risk	-	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0
SA8: Climate change	++/-	0	+	+	+	+	+/-	0	-	0	0	0	0	0	0	0
SA9: Biodiversity	--?	--?	--/+?	--/+?	--/+?	--/+?	--?	0	-	0	0	-	-	-	0	-
SA10: Historic environment	-	-	+/-	+/-	+/-	+/-	-	0	-	0	0	-	-	-	0	-
SA11: Landscape	-	-	+/-	+/-	+/-	+/-	-	0	-	0	0	-	-	-	0	-
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+ Minor positive effect likely			+/- or ++/- Mixed minor or significant effect likely		- Minor negative effect likely		--/+ Mixed significant negative and minor positive effect likely		-- Significant negative effect likely		0 Negligible effect likely	

### New homes policy recommendations

**6.245** The SA finds the new homes policies of the Draft Local Plan to deliver a range of significant and minor positive and negative effects across a range of SA objectives in the SA framework. Their focus on housing issues limits their potential to generate significant positive effects against all the SA objectives, although there may be scope to minimise the significance or likelihood of some of the potential adverse effects identified.

**6.246** The Council considered whether the significant negative effects recorded for DM Policy 12 (Affordable Homes) could be avoided or minimised through the requirement for some affordable homes in Dover. However, the District's Whole Plan Viability Study (2020) concludes that all affordable typologies of housing in Dover are shown to be unviable, as a result of the fact sites being located on previously developed land generating higher development costs and contingencies and the lower value of homes in the town. Therefore, the significant negative effect recorded against this SA objective for DM Policy 12 (Affordable Homes) cannot be reasonably mitigated.

**6.247** With regards to the significant negative effects identified for SA objective 5 (resources), as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further. Similarly, other potential environmental adverse effects identified against SA objectives 2 (health and well-being), 4 (transport) 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations. Consequently, these potential adverse effects are only likely to be completely avoided through the selection of alternative site options. The reasons for why the Council have selected the allocated sites over the reasonable alternatives performing equally well or better is set out in Appendix E of the SA Report accompanying the Draft Local Plan.

**6.248** Some of the minor adverse effects recorded against SA objective 2 (health and well-being) for Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated through additional policy wording requiring measures to avoid or mitigate adverse effects generated by certain sites in close proximity to sources of noise and air pollution or potential health and safety risks, such as site WIN014's close proximity to a sewage treatment works, or site NOR005's close proximity to recorded mine entries. The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.249** The original wording of Strategic Policy 3: Residential Windfall Development, DM Policy 13: Rural Local Needs Housing, DM Policy 14: Gypsy and Traveller Windfall Accommodation and DM Policy 17: Houses in Multiple Occupation required development not to have a significant impact on the living conditions of adjoining residents, allowing scope for some adverse effects. The SA recommended that the policies be reworded to require new development not to have an adverse effect on the living conditions/amenity of local residents. Three of the four policies were updated, reducing the likelihood of minor adverse effects against this SA objective. The exception was Strategic Policy 3 (Residential Windfall Development). This policy was not changed because the Council considered it to apply to significantly more potential sites than the other policies and would therefore potentially prohibit the delivery of the greater of number of homes on windfall sites. The original wording is therefore considered to deliver an appropriate balance between minimising adverse effects on health and well-being and the delivery of homes.

**6.250** Notwithstanding the lack of reasonable alternatives to the selected gypsy and traveller site allocation set out in Site Allocations Policy 2 (Land to the South of Alkham Valley Rd/ Land to the rear of The Meadows Alkham), the Council could consider setting out measures for improving the allocation's access to the District's local services and facilities and limit the likelihood of the significant adverse effects identified for this policy in relation to SA objective 2 (health and well-being). The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.251** The minor adverse effect recorded against SA objective 6 (air pollution) for Strategic Policy 4 (Whitfield Urban Expansion) and Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated further through additional policy wording requiring appropriate air quality assessments and mitigation strategies for sites identified in the Air Quality Study as having potential to slightly or moderately effect local air quality. The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.252** The minor adverse effect recorded against SA objective 7 (flood risk) for Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated further through additional policy wording requiring sustainable urban drainage systems (SUDs) measures to avoid or mitigated adverse effects generated by sites in surface water flood risk areas. The Council considered other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

**6.253** The significant adverse effect recorded against SA objective 9 (biodiversity) for Strategic Policy 2 (Housing Growth), Strategic Policy 3 (Residential Windfall Development), Strategic Policy 5 (North Aylesham), Strategic Policy 6 (South Aylesham), Strategic Policy 7 (Eythorne and Elvington Local Centre) and Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated further through consideration of the recommendations set out in the HRA Report accompanying the Draft Local Plan. Additional policy wording could also be included naming sensitive ecological habitats in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by development and new communities in the vicinity. For example, reference could be made to the Sandwich Bay and Hacklinge Marshes SSSI under site NOR005. The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.254** The minor adverse effect recorded against SA objective 10 (historic environment) for Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated further through additional policy wording naming sensitive historic assets in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by development. The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.255** The minor adverse effect recorded against SA objective 11 (landscape) for Site Allocations Policy 1 (Housing Allocations) could be avoided or mitigated further through additional policy wording naming sensitive views and settings in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by development. The Council plan to give this further consideration to this through the drafting of the next iteration of the new Dover Local Plan.

**6.256** The minor adverse effects recorded against SA objectives 9 (biodiversity), 10 (historic Environment) and 11 (landscape) for Strategic Policy 3 (Residential Windfall Development), DM Policy 13 (Rural Local Needs Housing), DM Policy 14 (Gypsy and Traveller Windfall Accommodation), DM Policy 15 (Self and Custom Build Housing) and DM Policy 17 (Houses in Multiple Occupation) because the policies require development to not cause significant adverse effects to the local environment could be avoided or mitigated further by altering the wording to require development to cause no harm to the local environment. Furthermore, the policies could go further and encourage development to protect and enhance biodiversity, historic assets or landscapes and townscapes. The Council considered adding in additional wording requiring developers to design in such mitigation and enhancement measures into all development proposals but concluded that making this mandatory for all planning applications would unnecessarily prohibit development or undermine the viability of projects, with adverse effects against SA objective 1 (housing). The Council therefore considers an appropriate balance should therefore be struck between the two. Furthermore, other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

## Employment and Local Economy Policies

**6.257** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define 16 employment and local economy policies in the Draft Local Plan:

- Strategic Policy 8: Economic Growth.
- Strategic Policy 9: Employment Allocations.
- DM Policy 18: New Employment Development.
- DM Policy 19: Retention of Existing Employment Sites.
- DM Policy 20: Loss or Re-development of Employment Sites and Premises.
- DM Policy 21: Home Working.
- DM Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes.
- DM Policy 23: New Employment Premises in the Countryside.
- DM Policy 24: Tourism and Tourist/Visitor Accommodation.

### Reasonable alternatives SA

**6.258** Before the definition of the preferred draft policies, consideration has been given to a range of policy options under each of the above employment and local economy policy headers.

**6.259** The options considered and their reasonableness are reported under each issue header below. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is included after each appraisal.

## Economic growth

**6.260** In order to identify the Council's preferred economic growth strategy, consideration has been given to how many jobs should be planned for, the District's economic growth ambitions and where economic growth should go. Two reasonable potential scales of economic growth have been considered for delivering new jobs over the Plan period:

- a. **Growth Option 1<sup>42</sup>**: Lowest growth scenario – meeting the minimum objectively assessed needs of the District: potentially no net increase in employment land over the Plan period<sup>43</sup>.
- b. **Growth Options 2 and 3<sup>44</sup>**: Highest growth scenario – maximising the economic growth potential of the District by allocating all suitable and potentially suitable employment sites, with a total capacity of 138,238m<sup>2</sup>.

**6.261** Five potential geographical distributions of economic growth have been considered for growth options 2 and 3:

- a. **Spatial Option A**: Distributing growth to the District's suitable and potentially suitable employment site options.
- b. **Spatial Option B**: Distributing growth proportionately amongst the District's existing settlements based on their population.
- c. **Spatial Option C**: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy.
- d. **Spatial Option D**: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- e. **Spatial Option E**: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

**6.262** All potential combinations of the reasonable growth and spatial options are appraised in **Chapter 4**. Other growth and spatial options were considered but were discounted as unreasonable. Justification for why these other options were deemed to be unreasonable can also be found in **Chapter 4**.

### Council's reasons for selecting the preferred option

**6.263** Following the SA of the options, the Council elected to expand the area of employment land allocated in the Draft Local Plan. Although the latest Economic Development Needs Assessment (2017) suggests no additional allocations are required over the Plan period, the Council considered that such a strategy would not deliver the Council's other aspirations for the Local Plan. These are to provide a more prosperous economy, reduce inequality, levels of deprivation and provide the regeneration the District needs, i.e. a higher level of economic growth is required in order to achieve the strategic objectives of the Plan. Therefore, the preferred option was to base the level of economic growth on the draft Economic Growth Strategy. It was considered that this would provide an aspirational but realistic level of economic growth, based upon an analysis of the key strengths and opportunities in the District.

**6.264** However, until the Economic Development Needs Assessment is updated, post Regulation 18, there is uncertainty around the level of jobs growth anticipated over the Plan period and the amount of new employment land that would be required to deliver this.

**6.265** This preferred scale and distribution of growth is appraised below in the SA of the draft Employment and Local Economy policies.

### Employment allocations

**6.266** All reasonable employment site options considered for allocation in the Draft Local Plan are appraised in **Chapter 5**. Justification for the selection of site allocations is included in Appendix E of the SA Report accompanying the Draft Local Plan. In summary, site selection is informed by the findings of the District's Housing and Employment Land Availability Assessment

<sup>42</sup> Growth Option 2 contains the same scale of potential housing development to Growth Option 1, but a different scale of potential employment land development.

<sup>43</sup> The Economic Development Needs Assessment (2017) forecasts a negative requirement in new floorspace for employment development over the Plan period.

<sup>44</sup> Both growth options 2 and 3 include the same potentials scale of employment land development: up to 138,238m<sup>2</sup>.



(HELAA), the Sustainability Appraisal of the reasonable site options and further evidence, such as the highways modelling and engagement with ward members and town and parish Councillors.

**6.267** As noted above, there is uncertainty around the level of jobs growth anticipated over the Plan period and the amount of new employment land that will be required to deliver this. Furthermore, there is uncertainty around the future availability of White Cliffs Business Park for general employment purposes, as well as the capacity of Discovery Park to accommodate more growth.

#### **Council's reasons for selecting the preferred option**

**6.268** In light of the above, the sites allocated in the Draft Local Plan have been selected in accordance with the Council's preferred option for the distribution of growth (as set out above), as well as the suitability, availability and achievability of individual site options.

**6.269** Although there is still some remaining development potential on existing allocations, which can be rolled forward into the new draft Local Plan, options for allocating further land for employment development are currently limited and further land is therefore likely to be required to deliver the Council's Economic Growth Strategy. The Council therefore carried out a call for employment sites as part of the Regulation 18 consultation on the Local Plan. New reasonable site options identified through this exercise are subjected to SA in **Chapter 5** of this SA Report.

#### **New employment development and the retention of existing employment sites**

**6.270** In order to deliver the Council's preferred economic growth strategy, consideration has been given to the following policy options for location employment allocations:

- a. Identify strategic and non-strategic site allocations for employment growth.
- b. Criteria based policy supporting new employment development that comes forward outside of allocated sites to guide where new employment development would be considered acceptable in principle, subject to detailed criteria.
- c. Blanket protection of all existing employment premises.
- d. Protect a list of sites which are considered to play a strategic role in the economy of the District.

**6.271** All four options have the potential to generate **significant positive** effects against SA objective 3 (employment) and a minor positive effect against SA objective 2 (health and well-being) by virtue of the fact that these options have the potential to meet the District's economic growth needs and aspirations.

**6.272** Although option b is likely to offer the greatest flexibility in the location and delivery of economic growth, its ability to deliver the District's needs and aspirations is less certain. Conversely, the allocation of new employment sites (option a) and/or the reallocation of existing employment sites with capacity for expansion or densification will offer less flexibility but greater certainty with regards to deliverability. Option d is considered to be a more tailored approach to the protection of employment sites than option c, acknowledging that some employment sites in the District are less viable and strategically important than others.

**6.273** By focussing exclusively on existing employment sites, options c and d offer less scope for the loss of further greenfield land in the District and its potential natural resources, ecological, landscape character and historic value. Options a and b on the other hand offer greater scope for the development of greenfield land with the potential for adverse effects against SA objectives 5 (resources), 7 (flood risk), 9 (biodiversity), 10 (historic environment) and 11 (landscape). The potential significance of these adverse effects is dependent on the location and scale of the allocations identified and the developments delivered.

#### **Council's reasons for selecting the preferred option**

**6.274** In the context of the economic growth objectives for the Council, the preferred policy approach is to include policies for options a, b and c by allocating new and protecting existing employment sites which provide an important contribution to the overall employment floorspace provision within the District and to also allocate land at employment sites which are able to provide future additional employment growth. This will ensure that a supply of employment land for existing and future growth can be allowed for within the Plan period.

**6.275** The reasonable employment site options (existing and new) considered for allocation in the Draft Local Plan are appraised in **Chapter 5**. Justification for the selection of site allocations at this stage is included in Appendix E of the SA Report accompanying the Draft Local Plan.

## Home working

**6.276** The Council has considered the following policy options with regards to managing homeworking in the Draft Local Plan:

- a. Requiring live/work units to be provided within allocated sites and/or new residential development ensuring a dedicated workspace is provided within new residential properties to enable home-working to be accommodated comfortably.
- b. Reliance only on the national space standards.
- c. Supporting opportunities for home working within existing residential properties, subject to criteria.

**6.277** The omission of a local policy on this issue (option b) in favour of relying on national space standards would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.278** Adopting a local approach to the management of this issue (either or both options a and c) has the potential to generate at least a minor positive effects against SA objective 3 (employment) by giving people greater flexibility and opportunity in their place of work. This greater flexibility and opportunity will also have indirect minor positive effects against SA objective 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change) by reducing the need for the District's residents to commute to work with or outside the District, offering greater work-life balance, reducing road congestion and its associated adverse effects.

**6.279** A policy encouraging homeworking in both existing and new homes would result in greater positive effects than a policy that prioritised one over the other.

### Council's reasons for selecting the preferred option

**6.280** In light of the increasing requirement for homeworking space, the Council considered a local policy requiring suitable facilities be incorporated into new build (option a) and criteria for home working within existing residential properties (option c) was appropriate.

## New employment premises in the countryside and conversion or rebuild of rural buildings for economic development purposes

**6.281** The Council has considered the following policy options with regards to managing economic growth in rural areas:

- a. Support the conversion of existing rural buildings into uses that will grow and diversify the local economy.
- b. Support new economic development within or adjoining the existing rural settlements.
- c. Restrict new economic development within or adjoining the existing rural settlements.

**6.282** Options a and b have the potential to generate positive effects against SA objective 3 (employment), although option b is more likely to generate **significant positive** effects against this SA objective due to it being less constrained and offering encouragement to rural economic growth more widely. Option b also has more potential to generate adverse environmental effects than option by virtue of the fact it is less focussed on locations that have already experienced some development. By supporting the conversion of existing rural buildings, option a is also likely to generate a minor positive effect against SA objective 5 (resources), whereas option b is more likely to generate minor adverse effects against this objective. However, both options a and b have the potential to generate adverse effects against SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape).

**6.283** New employment and commercial centres in the rural area where there are fewer opportunities for are likely to increase traffic on rural roads where there is less capacity with the potential for adverse effects against SA objectives 4 (transport) and 6 (air pollution). The potential significance of these adverse effects is dependent on the location and scale of the rural economic development.

**6.284** Option c would prohibit economic growth in rural areas, resulting in largely opposite effects to those described for options a and b. There would be the potential for adverse effects on SA objective 3 (employment) by limiting the potential for the growth and diversification of the District's rural economy. However, with less opportunity for economic development in rural areas there

would be less opportunity for adverse effects against SA objectives 4 (transport), 5 (resources), 6 (air pollution), 7 (flood risk), 9 (biodiversity), 10 (historic environment) and 11 (landscape).

#### **Council's reasons for selecting the preferred option**

**6.285** The Council's preferred policy approach was to include specific policies for conversions of rural buildings for economic development purposes (option a) and a criteria-based policy for new rural economic growth sites (option b) to allow for a more flexible and bespoke approach to new rural development.

#### **Tourism and tourist/visitor accommodation**

**6.286** The Council has considered the following policy options with regards to managing tourism and the visitor economy in the Draft Local Plan:

- a. Allocate specific sites or promote tourism uses and holiday accommodation in specific locations.
- b. Criteria based policy supporting new tourism facilities and accommodation.

**6.287** Both options have the potential to generate **significant positive** effects against SA objective 3 (employment) and a minor positive effect against SA objective 2 (health and well-being) by virtue of the fact that these options have the potential to meet the District's economic growth needs and aspirations and provide new and improved recreational attractions.

**6.288** Although option b is likely to offer the greatest flexibility in the location and delivery of tourism and holiday development, its ability to deliver the District's needs and aspirations is less certain. Conversely, the allocation of new tourism and holiday accommodation sites (option a) will offer less flexibility but greater certainty with regards to deliverability.

**6.289** Both options have the potential to result in the loss of greenfield land with the potential for adverse effects against SA objectives 5 (resources), 9 (biodiversity), 10 (historic environment) and 11 (townscape).

**6.290** New and improved tourism and associated accommodation facilities will attract more visitors to the area, increasing traffic on the roads with the potential for adverse effects against SA objectives 4 (transport) and 6 (air pollution). The potential significance of these adverse effects is dependent on the location and scale of the allocations identified and the developments delivered.

#### **Council's reasons for selecting the preferred option**

**6.291** The preferred policy approach was to provide a more flexible criteria based policy which supports the provision of new tourism facilities in suitable locations in order to support the overarching Tourism Strategy for the Council.

#### **Employment and local economy policies SA**

**6.292** **Table 6.5** sets out the likely effects of the Draft Local Plan employment and local economy policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home**

**6.293** DM Policy 20 (Loss or Re-development of Employment Sites and Premises) is considered to have a minor positive effect on this SA objective because it sets out the conditions within which employment sites and premises can be redeveloped, offering flexibility to deliver more homes in the District under certain circumstances.

#### **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**6.294** The economic growth and spatial strategy set out in Strategic Policy 8 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment to deliver economic growth in the District. This has the potential to generate a **significant positive** effect against this SA objective by focussing growth in sustainable locations, creating jobs that will contribute to the general prosperity of the local population and investing in infrastructure that limits the need for commuting. However, the intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more noise, air and light pollution, resulting in the potential for some adverse effects against this SA objective.

**6.295** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy focussing on areas of existing activity, resulting in a mixed significant positive and minor negative effect overall.

**6.296** The two employment site allocation policies Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) are considered likely to generate mixed minor positive and minor negative effects against this SA objective. This is in acknowledgement of the fact that the vast majority of the allocated site areas are already developed and/or in use as employment sites and their retention reduces the need to develop new employment sites elsewhere, limiting the potential of exposing new communities to the sources of pollution that might be generated by new employment sites. However, some of the existing employment sites lie within and close proximity to Air Quality Management Areas (AQMA) – notably sites 17 (A20 Sites) and 18 (Dover Waterfront)<sup>45</sup>. Therefore, intensification of land uses at these premises has the potential to further reduce local poor air quality, which has the potential to adversely affect nearby residents, workers and visitors. Given these employment sites are already established, these effects are recorded as minor.

**6.297** DM Policy 20 (Loss or Re-development of Employment Sites and Premises), DM Policy 21 (Home Working) and DM Policy 24 (Tourism and Tourist/Visitor Accommodation) are expected to generate a minor positive effect against this objective. This is because these policies all seek to improve the amenity and/or quality of life of local people and visitors through the developments they manage.

**6.298** DM Policy 18 (New Employment Development), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) are expected to have a minor negative effect against this objective. This is because these policies require rural employment developments not to have a significant impact on the amenities of local residents, offering some scope for minor adverse effects.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.299** A **significant positive** effect is expected for the following employment and local economy policies against this SA objective:

- Strategic Policy 8: Economic Growth.
- Strategic Policy 9: Employment Allocations.
- DM Policy 18: New Employment Development.
- DM Policy 19: Retention of Existing Employment Sites.
- DM Policy 23: New Employment Premises in the Countryside.
- DM Policy 24: Tourism and Tourist/Visitor Accommodation.

**6.300** This is because these policies support the Council's aspiration to deliver a higher level of economic growth through the diversification of the economy, investment in infrastructure and the potential development of significant new employment premises, along with the development of new tourism attractions and holiday accommodation.

**6.301** DM Policy 20 (Loss or Re-development of Employment Sites and Premises), DM Policy 21 (Home Working) and DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) are expected to generate a minor positive effect as these policies protect existing employment premises and facilitate investment in new business opportunities, with net benefits for the local economy. However, a minor negative effect is also recorded for DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes), resulting in a mixed minor positive and minor negative effect overall. This is because the policy sets out the circumstances in which employment sites or premises can be lost or redeveloped for other uses, offering scope for a general reduction in the extent of employment opportunities in certain parts of the District, albeit in relatively rare circumstances.

### SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**6.302** The economic growth and spatial strategy set out in Strategic Policy 8 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment. The intensification, diversification and expansion of the District's

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<sup>45</sup> It is also noted that Site 5 (Pike Road Industrial Estate) is located in close proximity to known mine entries recorded by the Coal Authority. However, given the Industrial Estate has been in operation for some time, the mine entry is not considered to pose a significant risk to the health and safety of the workers at the site.

economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's aim to plan for a higher level of growth.

**6.303** The two employment site allocation policies Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) are considered likely to generate mixed minor positive and minor negative effects against this SA objective. This is in acknowledgement of the fact that the vast majority of the allocated site areas are already developed and have relatively good access to the District's strategic and sustainable transport options. However, some of the existing employment sites lie within and close proximity to Air Quality Management Areas (AQMA) – notably sites 17 (A20 Sites) and 18 (Dover Waterfront), which are prone to congestion.

**6.304** Some of the allocations are located in more remote locations with poorer access to a good range of sustainable transport options – notably site 1 (Ramsgate Road) and 13 (The Worth Centre). Intensification of economic land uses, particularly at these sites, has the potential to result in greater road traffic. Given these employment sites are already established, these effects are recorded as minor.

**6.305** A minor positive effect is expected for DM Policy 21 (Home Working) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network during commuting hours and therefore positively contributing to reducing congestion.

**6.306** A minor positive effect is expected for DM Policy 24 (Tourism and Tourist/Visitor Accommodation) against this objective. Although investment in new and improved tourism and holiday accommodation has the potential to significantly increase the number of visitors to the District, the policy requires that any new proposals must not detrimentally impact the road network and will be accessed by a range of means of transport. This strong policy wording eliminates the potential for notable congestion issues being generated by new tourism proposals and offers scope for investment in new and improved sustainable transport networks.

**6.307** A minor negative effect is recorded for DM Policy 18 (New Employment Development), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) against this objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of some adverse effects on the highway network.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.308** Mixed **significant positive** and **significant negative** effects are recorded for Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) against this SA objective. The significant positive effects acknowledge the focus on the intensification of economic growth within the District's existing employment sites, minimising the loss of further greenfield land elsewhere. However, some of the employment sites contain areas of greenfield land designated as some of the best and most versatile agricultural land in the District, are safeguarded for their mineral resources or sit on top of sensitive source protection zones. For example, the southward expansion of the employment land at Aylesham (Site 4: Aylesham Development Area).

**6.309** A minor positive effect is expected for DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) against this objective. This is because the policy facilitates the conversion of existing rural buildings to employment, non-residential tourism, leisure or community-related uses before the development of greenfield land. Buildings must not require complete or substantial reconstruction which encourages the re-use of existing building materials.

**6.310** Minor negative effects are expected for DM Policy 18 (New Employment Development), DM Policy 23 (New Employment Premises in the Countryside) and DM Policy 24 (Tourism and Tourist/Visitor Accommodation) against this objective, as the policies facilitate the development of new employment and tourism attractions that have the potential to be developed on greenfield land, where there is greater scope to lose natural resources.

#### SA 6: To reduce air pollution and ensure air quality continues to improve

**6.311** The economic growth and spatial strategy set out in Strategic Policy 8 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment. Some of the existing employment sites lie within and close proximity to Air Quality Management Areas (AQMA) – notably sites 17 (A20 Sites) and 18 (Dover Waterfront), which are prone to congestion. Intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's aim to upgrade critical infrastructure and focussing on central locations.

**6.312** A negligible effect is recorded for the two employment site allocation policies Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) because the Council's Air Quality Study did not identify these site locations as having the potential to adversely affect air quality.

**6.313** A minor positive effect is expected for DM Policy 21 (Home Working) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network during commuting hours and therefore positively contributing to reducing congestion and the associated concentration of air pollution on the strategic highway network.

**6.314** A minor negative effect is recorded for DM Policy 18 (New Employment Development), DM Policy 23 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) against this objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of increasing the number of cars on the District's roads, resulting in the potential for more road-based air pollution.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**6.315** Minor adverse effects are recorded for Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites). Although the vast majority of the allocations cover existing employment sites with integrated urban drainage systems, some greenfield land lies within these locations and the majority of the sites contain flood risk zones and/or land known to be vulnerable to surface water flooding. Intensification/densification as a result of economic growth will generally increase the likelihood of flooding and extreme heating in the developed parts of the District.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**6.316** The economic growth and spatial strategy set out in Strategic Policy 8 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment. The intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to increase greenhouse gas emissions, at least in the short to medium term. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the general trend towards more homeworking/remote and coworking facilities.

**6.317** The two employment site allocation policies Strategic Policy 8 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) are considered likely to generate mixed minor positive and minor negative effects against this SA objective. This is in acknowledgement of the fact that the vast majority of the allocated site areas are already developed and have relatively good access to the District's strategic and sustainable transport options. However, some of the existing employment sites are located in more remote locations with poorer access to a good range of sustainable transport options – notably site 1 (Ramsgate Road) and 13 (The Worth Centre). Intensification of economic land uses, particularly at these sites, has the potential to result in greater road traffic and associated greenhouse gas emissions. Given these employment sites are already established, these effects are recorded as minor.

**6.318** A minor positive effect is expected for DM Policy 21 (Home Working) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network

during commuting hours and therefore positively contributing to reducing congestion and greenhouse gas emissions associated with vehicle use.

**6.319** A minor negative effect is recorded for DM Policy 18 (New Employment Development), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and Policy 23 (New Employment Premises in the Countryside) against this objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of increasing the number of cars on the District's roads, resulting in the potential for more road-based travel and associated greenhouse gas emissions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**6.320** A precautionary **uncertain significant negative** effect is recorded for Strategic Policy 9 (Employment Allocations). Similarly, minor negative effects are recorded for the following policies against this SA objective:

- Strategic Policy 8: Economic Growth.
- DM Policy 18: New Employment Development.
- DM Policy 19: Retention of Existing Employment Sites.
- DM Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes.
- DM Policy 23: New Employment Premises in the Countryside.
- DM Policy 24: Tourism and Tourist/Visitor Accommodation.

**6.321** The precautionary uncertain significant adverse effect for Strategic Policy 9 (Employment Allocations) is in acknowledgement of the findings of the Habitats Regulations Assessment (HRA) of the Draft Local Plan. The HRA concludes that adverse effects on the integrity of local European sites cannot be ruled out until further information is provided, and where necessary appropriate mitigation measures are put in place, to rule out water quality effects. This is because some site allocations are located on greenfield land and in close proximity to sensitive ecological habitats. Some of the employment allocations are located in close proximity to European and/or Sites of Special Scientific Interest (SSSIs) and fall within their Impact Risk Zones defined by Natural England. For example sites 1 (Ramsgate Road), 2 (Discovery Park) and 3 (Sandwich Industrial Estate) lie between the Sandwich Bay and Hacklinge Marshes SSSI and the Ash Level and South Richborough Pasture Local Wildlife Site. Others contain and lie in close proximity to recognised priority habitats and other local wildlife sites. All the allocations generally cover existing operational employment sites, limiting the potential significant adverse effects on local ecology, but there is still potential to affect the integrity of habitats directly or indirectly in close proximity over the Plan period, through noise, light, water and air pollution.

**6.322** DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) states that such development should not result in any significant adverse impacts on biodiversity, leaving scope for more minor adverse effects. DM Policy 24 (Tourism and Tourist/Visitor Accommodation) requires that proposals do not detrimentally impact on the surrounding area but does not elaborate on whether this extends to all types of environmental effects including impacts on ecology. In relation to serviced tourist accommodation, the policy requires appropriate mitigation to deal with any increase in recreational pressure on designated conservation sites, but the same requirement is not set out for general tourism proposals or self-catering tourist accommodations.

**6.323** The same could also be said for DM Policy 18 (New Employment Development) and DM Policy 23 (New Employment Premises in the Countryside), both of which state that such development must be integrated sensitively into its context respecting sites of biodiversity value, but this does not eliminate the potential for some adverse effects.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.324** A minor negative effect is expected for the following policies against this SA objective:

- Strategic Policy 8: Economic Growth.
- Strategic Policy 9: Employment Allocations.
- DM Policy 18: New Employment Development.
- DM Policy 19: Retention of Existing Employment Sites.
- DM Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes.

- DM Policy 23: New Employment Premises in the Countryside.
- DM Policy 24: Tourism and Tourist/Visitor Accommodation.

**6.325** Many of the employment allocations are located in close proximity to known historic assets. Given all the allocations generally cover existing operational employment sites it is considered that any significant negative effects on the significance or setting of these assets have already occurred or have been mitigated, limiting the potential for further significant adverse effects in the Plan period. However, the intensification/densification of economic activity and development in these locations results in the potential for additional adverse effects on visual setting or more directly through noise, light, water and air pollution.

**6.326** DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) states that such development should not result in any significant adverse impacts on the character of any settlement or buildings or the surrounding landscape. DM Policy 24 (Tourism and Tourist/Visitor Accommodation) requires that proposals do not detrimentally impact on the surrounding area but does not elaborate on whether this extends to all types of environmental effects, including impacts on the historic environment.

**6.327** The same could also be said for DM Policy 18 (New Employment Development) and DM Policy 23 (New Employment Premises in the Countryside), both of which state that such development must be integrated sensitively into its context respecting the character of any important existing buildings and the landscape setting, but this does not eliminate the potential for some adverse effects.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.328** A minor negative effect is expected for the following policies against this SA objective:

- Strategic Policy 8: Economic Growth.
- Strategic Policy 9: Employment Allocations.
- DM Policy 18: New Employment Development.
- DM Policy 19: Retention of Existing Employment Sites.
- DM Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes.
- DM Policy 23: New Employment Premises in the Countryside.
- DM Policy 24: Tourism and Tourist/Visitor Accommodation.

**6.329** Some of the employment allocations are located in close proximity to known sensitive landscape and townscape assets, for example Site 8 (Barwick Road Industrial Estate) falls within the Kent Downs Area of Outstanding Natural Beauty (AONB). Given all the allocations generally cover existing operational employment sites it is considered that any significant negative effects on the significance or setting of sensitive landscape and townscape features have already occurred or have been mitigated, limiting the potential for further significant adverse effects in the Plan period. However, the intensification/densification of economic activity and development in these locations results in the potential for additional adverse effects on visual setting or more directly through noise, light, water and air pollution.

**6.330** DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) states that such development should not result in any significant adverse impacts on the character of any settlement or buildings or the surrounding landscape, leaving scope for more minor adverse effects. DM Policy 24 (Tourism and Tourist/Visitor Accommodation) requires that proposals do not detrimentally impact on the surrounding area but does not elaborate on whether this extends to all types of environmental effects including impacts on the District's landscapes and townscapes.

**6.331** The same could also be said for DM Policy 18 (New Employment Development) and DM Policy 23 (New Employment Premises in the Countryside), both of which state that such development must be integrated sensitively into its context respecting the character of any important existing buildings and the landscape setting, but this does not eliminate the potential for some adverse effects.



Table 6.5: Likely effects of Draft Local Plan employment and local economy policies

Employment and Local Economy Policies / SA Objectives	Strategic Policy 8: Economic Growth	Strategic Policy 9: Employment Allocations	DM Policy 18: New Employment Development	DM Policy 19: Retention of Existing Employment Sites	DM Policy 20: Loss or Re-development of Employment Sites and Premises	DM Policy 21: Home Working	DM Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes	DM Policy 23: New Employment Premises in the Countryside	DM Policy 24: Tourism and Tourist/Visitor Accommodation
SA1: Housing	0	0	0	0	+	0	0	0	0
SA2: Health and well-being	++/-	+/-	-	+/-	+	+	-	-	+
SA3: Employment	++	++	++	++	+/-	+	+	++	++
SA4: Transport	-	+/-	-	+/-	0	+	-	-	+
SA5: Resources	++/--	++/--	-	++/--	0	0	+	-	-
SA6: Air pollution	-	0?	-	0?	0	+	-	-	0
SA7: Flood risk	-	-	0	-	0	0	0	0	0
SA8: Climate change	-	+/-	-	+/-	0	+	-	-	0
SA9: Biodiversity	-	--?	-	-	0	0	-	-	-
SA10: Historic environment	-	-	-	-	0	0	-	-	-
SA11: Landscape	-	-	-	-	0	0	-	-	-
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+	+	+/- or ++/-- Mixed minor or significant effect likely	-	-	-- Significant negative effect likely	0 Negligible effect likely

### Employment and local economy policy recommendations

**6.332** The SA finds the employment and local economy policies of the Draft Local Plan to deliver a range of significant and minor positive and negative effects across a range of SA objectives in the SA framework. Their focus on employment and economic growth issues limits their potential to generate significant positive effects against all the SA objectives, although there maybe scope to minimise the significance or likelihood of some of the potential adverse effects identified.

**6.333** The significant adverse effects identified for SA objective 5 (resources) is the main exception in this regard, in so far as, as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further.

**6.334** Similarly, other potential environmental adverse effects identified against SA objectives 2 (health and well-being), 4 (travel) 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations. Consequently, these potential adverse effects are only likely to be completely avoided through the selection of alternative reasonable site options. The reasons for why the Council have selected the allocated sites over the reasonable alternatives performing equally well or better is set out in Appendix E of the SA Report accompanying the Draft Local Plan.

**6.335** Some of the minor adverse effects recorded against SA objective 2 (health and well-being) for Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) could be avoided or mitigated through additional policy wording requiring measures to avoid or mitigated adverse effects generated by the intensification or expansion of economic development/activity in these locations. The Council has considered this and concluded that other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

**6.336** DM Policy 18 (New Employment Development), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) require development not to have a significant impact on the living conditions of adjoining residents, allowing scope for some adverse effects. In light of this finding the Council considered rewording the policies to require new development not to have an adverse effect on the living conditions/amenity of local residents. However, the Council concluded that such changes could potentially prohibit the delivery of employment land and new jobs. The original wording is therefore considered to deliver an appropriate balance between minimising adverse effects on health and well-being and the delivery of employment land.

**6.337** The minor adverse effects recorded against SA objective 7 (flood risk) for Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) could be avoided or mitigated further through additional policy wording requiring sustainable urban drainage systems (SUDs) measures to avoid or mitigated adverse effects generated by sites' densification or expansion in flood risk areas.

**6.338** The significant adverse effect recorded against SA objective 9 (biodiversity) for Strategic Policy 9 (Employment Allocations) and minor negative effect recorded for DM Policy 19 (Retention of Existing Employment Sites) could be avoided or mitigated further through consideration of the recommendations set out in the HRA Report accompanying the Draft Local Plan. Additional policy wording could also be included naming sensitive ecological habitats in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by the intensification or expansion of the employment sites in the vicinity. For example, sites 1 (Ramsgate Road), 2 (Discovery Park) and 3 (Sandwich Industrial Estate) lie between the Sandwich Bay and Hacklinge Marshes SSSI and the Ash Level and South Richborough Pasture Local Wildlife Site.

**6.339** The minor adverse effect recorded against SA objective 10 (historic environment) for Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) could be avoided or mitigated further through additional policy wording naming sensitive historic assets in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by the intensification or expansion of the employment sites in the vicinity.

**6.340** The minor adverse effect recorded against SA objective 11 (landscape) for Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) could be avoided or mitigated further through additional policy wording naming sensitive views and settings in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by the intensification or expansion of the employment sites in the vicinity.

**6.341** The minor adverse effects recorded against SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape) for DM Policy 18 (New Employment Development), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes), DM Policy 23 (New Employment Premises in the Countryside) and DM Policy 24 (Tourism and

Tourist/Visitor Accommodation)) because the policies require development to not cause significant adverse effects to the local environment could be avoided or mitigated further by altering the wording to require development to cause no harm to the local environment. Furthermore, the policies could go further and encourage development to protect and enhance biodiversity, historic assets or landscapes and townscapes.

**6.342** With regards to the recommendations outlined above for SA objectives 7 (flood risk), 9 (biodiversity), 10 (historic environment) and 11 (landscape), the Council considered adding in additional wording requiring developers to design in such mitigation and enhancement measures into all employment development proposals. However, the Council concluded that making this mandatory for all planning applications would unnecessarily prohibit development or undermine the viability of projects, with adverse effects against SA objective 3 (employment). The Council therefore considers that an appropriate balance has therefore been struck between the two. Furthermore, other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

## Retail and Town Centre Policies

**6.343** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define seven retail and town centre policies in the Draft Local Plan:

- Strategic Policy 10: Quantity and Location of Retail Development.
- Strategic Policy 11: Dover Town Centre.
- Strategic Policy 12: Deal and Sandwich Town Centres.
- DM Policy 25: Primary Shopping Areas.
- DM Policy 26: Sequential Test and Impact Assessment.
- DM Policy 27: Local Centres.
- DM Policy 28: Shop Fronts.

## Reasonable alternatives SA

**6.344** Before the definition of the preferred draft policies, consideration has been given to a range of policy options under each of the above retail and town centre policy headers.

**6.345** The options considered and their reasonableness are reported under each retail and town centre issue header below. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is included after each appraisal.

### Quantity and location of retail development

**6.346** With regards to managing the quantity and location of retail development in the Local Plan, the Council considered there to be two broad options:

- a. Allocate specific sites for retail development in the District's towns.
- b. Focus on the overall quantitative capacity/need of each of the District's towns.

**6.347** The allocation of specific sites (option a) would result in greater certainty as to where retail development could be delivered over the Plan period although this approach would offer less flexibility if retail development needs change. Therefore, both options are considered to have the potential for a **significant positive** effect against SA objective 2 (health and well-being) and minor positive effect in relation to SA objective 3 (employment) for their contribution to the delivery of new local jobs, services and facilities.

**6.348** Both options are also likely to generate minor positive effects in relation to SA objectives 4 (transport), 6 (air pollution) and 8 (climate change) for their focus on delivering retail development in the District's established towns, where there is more opportunity to offer sustainable access that minimises the need for people to travel by private car and generate unnecessary and unsustainable levels of air pollution and greenhouse gases.

### Council's reasons for selecting the preferred option

**6.349** Given the uncertainty associated with Brexit and COVID-19, the Council concluded that a flexible quantitative approach focussing on the capacity/needs of each of the District's towns identified in the Council's Retail and Town Centre Needs

Assessment (2018) would be most appropriate. This approach is consistent with the NPPF which advocates a town centre first approach to the location of new retail development. Furthermore, it was considered that retail needs can be met through existing vacant premises in the primary shopping areas of the District's town centres and through the development opportunities identified in Dover Town Centre, set out in Strategic Policy 11. Therefore, option b was selected.

#### Dover town centre

**6.350** With regards to delivering retail opportunities in Dover Town Centre, the following options have been identified from the Council's Retail and Town Centre Needs Assessment for consideration:

- a. Having a policy that only permits main town centre uses within the town centre boundary.
- b. Having a more flexible approach to development in the town centre, which enables the development of other uses (including residential), alongside main town centre uses, within the town centre boundary.
- c. Maintaining the existing town centre boundary and primary shopping area.
- d. Defining a new town centre boundary and primary shopping area.

**6.351** All four options offer potential for **significant positive** effects against SA objective 2 (health and well-being) and minor positive effects against SA objective 3 (employment) for their contribution to the delivery of new local jobs, services and facilities in the District's regional centre, although options b and d offer greater opportunity to tailor the functionality of the town centre and react to changes in needs and opportunities over the Plan period.

**6.352** All options are also likely to generate minor positive effects in relation to SA objectives 4 (transport), 5 (natural resources), 6 (air pollution) and 8 (climate change) for their focus on delivering retail development in the District's largest centre, where there is the greatest opportunity to minimise the loss greenfield and reuse resources, offer sustainable access that minimises the need for people to travel by private car and generate unnecessary and unsustainable levels of air pollution and greenhouse gases.

**6.353** Additional minor positive effects are recorded against option b for SA objective 1 (housing) for the greater opportunity this option offers for delivering homes in Dover Town Centre.

#### Council's reasons for selecting the preferred option

**6.354** In light of the reasonable alternatives considered and appraised, the Council selected both option b and d. This is because redrawing the town centre boundary and primary shopping area will maximise the functionality of the area and greater flexibility offers more opportunity to deliver positive outcomes over the full Plan period whilst meeting the requirements of the NPPF.

#### Deal and Sandwich town centres

**6.355** With regards to delivering retail opportunities in Deal and Sandwich Town Centres, the following options have been identified from the Council's Retail and Town Centre Needs Assessment for consideration:

- a. Define Deal's centre to include the existing High Street/Oak Street intersection up to the High Street/New Street intersection and extend to over the town centre uses on St George's Road.
- b. Define Deal's centre to include all areas described under option a, and include Deal Town Hall, The Landmark Centre and Union Road Car park.
- c. Define Sandwich's centres to include Market Street, Cattle Market, King Street and part of New Street.
- d. Do not designate a primary shopping frontage in Sandwich's centre and rely on the NPPF and PGG for decision making in the area.

**6.356** All four options offer potential for **significant positive** effects against SA objective 2 (health and well-being) and minor positive effects against SA objective 3 (employment) for their contribution to the delivery of new local jobs, services and facilities, although options b and c offer greater opportunity for positive effects against these objectives because they encompass the larger areas of the centres.

**6.357** All options are also likely to generate minor positive effects in relation to SA objectives 4 (transport), 5 (natural resources), 6 (air pollution) and 8 (climate change) for their focus on delivering retail development in Deal and Sandwich, where there is the greatest opportunity to minimise the loss greenfield and reuse resources, offer sustainable access that minimises the need for people to travel by private car and generate unnecessary and unsustainable levels of air pollution and greenhouse gases.

#### **Council's reasons for selecting the preferred option**

**6.358** In light of the reasonable alternatives considered and appraised, the Council selected both option b and c. Extending Deal's centre boundary offers a more focussed and managed town centre context within which maintain and enhance its vitality and viability for residents, workers and visitors, in line with the projected level of growth required within the Retail and Town Centre Needs Assessment.

**6.359** Similarly, designating a primary shopping area in Sandwich was considered to be more positive and proactive in guiding decisions in the settlement's centre.

#### **Retail and town centres including primary shopping areas**

**6.360** With regards to the definition of acceptable uses in centres for shopping in the Local Plan, the Council considered there to be three broad options:

- a. Set out the acceptable use classes to be allowed within primary shopping areas.
- b. A more flexible approach which sets out the uses considered to be acceptable within retail and town centre areas, including the criteria and principles to be adhered to.
- c. Not allow residential uses within the ground floor of primary shopping areas to protect existing and future retail and commercial uses.

**6.361** Option c is likely to have a minor adverse effect on SA objective 1 (housing) by prohibiting the delivery of some homes in retail and town centre areas, but its protection of existing shopping areas is likely to generate minor positive effects against SA objectives 2 (health and well-being) and 3 (employment).

**6.362** Options a and b are also likely to generate minor positive effects against SA objectives 2 (health and well-being) and 3 (employment) for their contribution to the protection and maintenance of appropriate uses, although option b offers greater flexibility to deliver these benefits and adapt to changes in local and national circumstances over the Plan period.

#### **Council's reasons for selecting the preferred option**

**6.363** In light of the reasonable alternatives considered and appraised, the Council selected option b. This more flexible approach was considered to be more adaptable to the future uncertainties surrounding the COVID-19 pandemic, whilst still championing the vitality and viability of the District's primary shopping areas. The provision of residential uses within town centres was considered important to increase footfall and activity in town centres, however the provision of residential on the ground floor within the primary shopping areas is likely to have a negative effect on the commercial function of the area. The option to restrict residential on the ground floor was therefore considered to be justified.

#### **Sequential test and impact assessment**

**6.364** With regards to the definition of a sequential test for town centre uses not within town centres in accordance with the requirements of the NPPF, the Council considered there to be two broad options:

- a. Adopt a local approach setting out the expected requirements supported by the threshold evidenced in the Retail and Town Centre Needs Assessment.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for town centre use outside the District's town centres.

**6.365** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.366** Adopting a local approach to the management of this issue has the potential to generate minor positive effects against SA objectives 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change). This is because additional local requirements to prioritise the vitality and viability of existing sustainable centres will protect existing communities and local services and minimise travel and associated pollution.

#### **Council's reasons for selecting the preferred option**

**6.367** The Council elected to adopt a more localised policy utilising the impact assessment threshold of 350sqm as set out in the Council's evidence base.

#### **Local centres**

**6.368** With regards to the protection of local centres in the District, the Council considered there to be two broad options:

- a. Adopt a local approach that protects the loss of local convenience shops, by requiring evidence to support the loss of any unit in the form of active marketing for at least 12 months and ensuring any new convenience stores would be a maximum floorspace of 280sqm.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications in or for local centres.

**6.369** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.370** Adopting a local approach to the management of this issue has the potential to generate minor positive effects against SA objectives 2 (health and well-being), 4 (transport), 6 (air pollution) and 8 (climate change). This is because additional local requirements to prioritise the vitality and viability of existing local centres will protect existing communities and local services and minimise travel and associated pollution.

#### **Council's reasons for selecting the preferred option**

**6.371** The Council elected to adopt a more localised policy offering clarity and guidance for the loss of convenience stores and the size limits to minimise potential damage to the retail hierarchy and positively and proactively support new convenience stores through a criteria based policy.

#### **Shop fronts**

**6.372** With regards to the definition of a policy to protect the historic character and local distinctiveness of primary shopping areas, the Council considered there to be two broad options:

- a. Adopt a local shopfront policy which guides development in order to ensure alterations continue to positively contribute to the overall character of retail and commercial frontages within the District's centres.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications with the potential to influence the character of shop fronts.

**6.373** The omission of a local policy on this issue (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.374** Adopting a local approach to the protection of the character and distinctiveness of primary shopping areas has the potential to generate minor positive effects against SA objectives 2 (health and well-being), 3 (employment), 10 (historic environment) and 11 (landscape). This is because it will ensure the protection of the District's historic and locally distinctive centres and maintaining them as attractive places, to live, work and visit.

#### **Council's reasons for selecting the preferred option**

**6.375** The Council elected to adopt a local policy to guide alterations and development in order to ensure the vitality and viability of town centres can be maintained.

## Retail and town centre policies SA

**6.376 Table 6.6** sets out the likely effects of the Draft Local Plan retail and town centre policies. The reasoning for the identification of these likely effects is set out by SA objective below.

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**6.377** A minor positive effect is expected for the following policies against this objective:

- Strategic Policy 11: Dover Town Centre.
- DM Policy 25: Primary Shopping Areas.
- DM Policy 27: Local Centres.

**6.378** This is because Strategic Policy 11 (Dover Town Centre) and DM Policy 25 (Primary Shopping Areas) supports using the space above shops for residential uses and re-using or re-developing existing buildings. DM Policy 27 (Local Centres) aims to protect existing retail units, only allowing a change of use where it can be demonstrated that there is a lack of demand, alternative convenience retail provision is available within 800m walking distance or the replacement land use offers benefits which outweigh the loss. As such, this has the potential to free up other land for housing where appropriate.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**6.379** A **significant positive** effect is expected for the following policies against this objective:

- Strategic Policy 10: Quantity and Location of Retail Development.
- Strategic Policy 11: Dover Town Centre.
- Strategic Policy 12: Deal and Sandwich Town Centres.

**6.380** This is because these policies support the enhancement of the District's most important centres. Therefore, these policies promote equality of access and opportunity to adequate provision of retail services.

**6.381** DM Policy 25 (Primary Shopping Areas), DM Policy 26 (Sequential Test and Impact Assessment) and DM Policy 28 (Shop Fronts) are all expected to have a minor positive effect against this objective. This is because these policies protect existing shops, which generally contribute positively people's health and well-being.

**6.382** DM Policy 27 (Local Centres) is expected to have a mixed minor positive and minor negative effect against this objective, as this policy promotes the protection of existing shops, but also sets out the exceptional circumstances where a change of use or alternative use of a retail shop may be acceptable. This may result in a new loss of local services and facilities in certain parts of the District, albeit in locations where demand is lower.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.383** A minor positive effect is expected against all policies. This is because all the policies promote retail uses in town centres or protect existing shops and retail units. As such, residents will be able to use shops in accessible locations supporting the economy and shops that employ local people.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**6.384** A minor positive effect is expected against all policies except DM Policy 28 (Shop Fronts). This is because the majority of the policies help to protect accessible retail centres or varying scale, reducing the need for travel by private vehicle and their contribution to the congestion on the District's roads.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**6.385** A minor positive effect is expected against all policies except DM Policy 27 (Local Centres) and DM Policy 28 (Shop Fronts). This is because the majority of the policies directly encourage investment in established urban centres, helping to

maximise the potential of urban accessible locations and contributing to minimising the loss of greenfield land and its natural resources.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**6.386** A minor positive effect is expected against all policies except DM Policy 28 (Shop Fronts). This is because the majority of the policies help to protect accessible retail centres or varying scale, reducing the need for travel by private vehicle and their contribution to the poor air quality in certain parts of the District. Furthermore, some of the policies support mixed-use development and the development of upper floors above shops into residential units. Retail units will then be within walking distance for these residents.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**6.387** A minor positive effect is expected for Strategic Policy 11 (Dover Town Centre) and Strategic Policy 12 (Deal and Sandwich Town Centres) against this objective. This is because the policies support investment in existing and establishing new green infrastructure in the town centres. Green infrastructure can help reduce the urban heat island effect, which helps reduce the temperature in urban areas.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**6.388** A minor positive effect is expected against all policies except DM Policy 28 (Shop Fronts). This is because all the policies help to protect accessible retail centres or varying scale, reducing the need for travel by private vehicle and their contribution to the emission of greenhouse gases. Furthermore, the policies support mixed-use development and the development of upper floors above shops into residential units. Retail units will then be within walking distance for these residents, further reducing the need to more unsustainable modes of transport.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**6.389** A minor positive effect is expected for Strategic Policy 11 (Dover Town Centre) and Strategic Policy 12 (Deal and Sandwich Town Centres) against this objective. This is because the policies support investment in existing and establishing new green infrastructure in the town centres. Therefore, these policies may have a positive effect on the biodiversity within the urban area of Dover.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.390** A minor positive effect is expected against all policies except DM Policy 26 (Sequential Test and Impact Assessment) and DM Policy 27 (Local Centres). This is because the majority of policies aim to enhance the quality of the environment in town centres, which includes their local distinctiveness and historic character. Furthermore, the policies generally recognise the rich historical landscape, ensuring proposals conserve and enhance the setting and character of important Heritage Assets. DM Policy 28 (Shop Fronts) requires proposals to consider architectural styles and materials of buildings and the character of the wider street scene when designing shop fronts. Architectural or historic shop fronts must also be kept and restored. As such, the policies have the potential to maintain and improve the District's historic environment.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.391** A minor positive effect is expected against all policies except DM Policy 26 (Sequential Test and Impact Assessment) and DM Policy 27 (Local Centres). This is because these policies aim to enhance the quality of the environment in town centres, including the local distinctiveness of the District's townscapes.

**6.392** The policies require all proposals to demonstrate a quality design that makes a contribution to the character of centres, including any proposed buildings and public realm. DM Policy 28 (Shop Fronts) requires proposals to keep the scale, proportion, composition, design and decorative treatment in keeping with the character and appearance of the building and wider street scene. As such, the policies will have a positive effect on the District's townscapes, as well as minimise harm to the wider open countryside by maximising the sustainable potential of urban centres.



Table 6.6: Likely effects of Draft Local Plan retail and town centre policies

Retail and Town Centre Policies / SA Objectives	Strategic Policy 10: Quantity and Location of Retail Development	Strategic Policy 11: Dover Town Centre	Strategic Policy 12: Deal and Sandwich Town Centres	DM Policy 25: Primary Shopping Areas	DM Policy 26: Sequential Test and Impact Assessment	DM Policy 27: Local Centres	DM Policy 28: Shop Fronts
SA1: Housing	0	+	0	+	0	+	0
SA2: Health and well-being	++	++	++	+	+	+/-	+
SA3: Employment	+	+	+	+	+	+	+
SA4: Transport	+	+	+	+	+	+	0
SA5: Resources	+	+	+	+	+	0	0
SA6: Air pollution	+	+	+	+	+	+	0
SA7: Flood risk	0	+	+	0	0	0	0
SA8: Climate change	+	+	+	+	+	+	0
SA9: Biodiversity	0	+	+	0	0	0	0
SA10: Historic environment	+	+	+	+	0	0	+
SA11: Landscape	+	+	+	+	0	0	+
<b>Key</b>	++ Significant positive effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		0 Negligible effect likely

### Retail and town centre policy recommendations

**6.393** The SA generally finds that retail and town centre policies of the Draft Local Plan to deliver positive effects against the majority of the SA objectives, and sometimes their focus on specific retail and town centre issues limits their potential to generate minor positive effects against certain SA objectives.

**6.394** DM Policy 27 (Local Centres) offers scope for losing local centre uses in certain circumstances, which may adversely affect people's access to local services and facilities; however, this is only when the retail use is no longer viable which is deemed acceptable, limiting the potential significance of these adverse effects. An amendment to this policy to remove the flexibility to lose local centre uses is not recommended as it would result in less scope to adapt to changes in local circumstances and inhibit the provision of other needed uses, such as affordable homes, in these locations, where appropriate.

**6.395** Strategic Policy 11 (Dover Town Centre) highlights the importance of green infrastructure within the town centre. The original wording in Strategic Policy 12 (Deal, Sandwich Town Centres) did not include this reference, limiting the opportunity for positive effects against SA objectives 7 (flood risk) and 9 (biodiversity). The Council subsequently updated Strategic Policy 12 (Deal, Sandwich Town Centres) to include this wording, resulting in the potential for minor positive effects against these SA objectives alongside Strategic Policy 11 (Dover Town Centre).

### Transport and Infrastructure Policies

**6.396** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define nine transport and infrastructure policies in the Draft Local Plan:

- Strategic Policy 13: Infrastructure and Developer Contributions.
- Strategic Policy 14: Strategic Highway Infrastructure.
- DM Policy 29: The Highway Network and Highway Safety.
- DM Policy 30: Parking Provision on New Development.
- DM Policy 31: Providing Open Space.
- DM Policy 32: Playing Pitch Strategy.
- DM Policy 33: Protection of Open Space.
- DM Policy 34: Community Facilities.
- DM Policy 35: Digital Technology.

### Reasonable alternatives SA

**6.397** Before the definition of the preferred draft policies, consideration has been given to a range of policy options under each of the above transport and infrastructure policy headers.

**6.398** The options considered and their reasonableness are reported under each retail and town centre issue header below. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is provided after each appraisal.

### Infrastructure and developer contributions

**6.399** With regards to the protection and investment in new and improved infrastructure in the District, the Council considered there to be two options:

- a. Adopt a similar approach to the existing Core strategy strategic policy CP6, which places an overarching requirement for necessary infrastructure to be considered on a case by case basis and captured using Section 106 agreements, with new references to the Infrastructure Delivery Plan and site allocation policies.
- b. Introduce the Community Infrastructure Levy (CIL) which would allow a set financial amount to be captured from all development. The rate would be informed by the whole viability study and would likely include a threshold below which developer contributions would not be sought.

**6.400** Both of the options have the potential to generate **significant positive** effects against SA objectives 2 (health and well-being) and 4 (travel) both of which cover planning issues which benefit from the greatest investment in local infrastructure, services and facilities. Investment in infrastructure associated with SA objectives 5 (natural resources), 6 (air quality), 7 (flood

risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are also likely but are generally rarer resulting in more minor positive effects.

**6.401** The provision of new local infrastructure is likely to create new local jobs with minor positive effects against SA objective 3 (employment). Furthermore, investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). These effects are however uncertain as it depends on the strength of policy wording and criteria for requiring infrastructure investment.

**6.402** General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

**6.403** Similarly, the strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to invest in infrastructure the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

**6.404** Option a is considered to represent a more comprehensive policy in so far as it applies to all development regardless of scale and location; however, option b offers greater opportunity pool funds for strategic-scale infrastructure projects where there is greater opportunity to access economies of scale.

#### **Council's reasons for selecting the preferred option**

**6.405** The Council elected to continue with option a, adding references to site specific needs within site allocation policies and detailing the latest infrastructure evidential requirements in the Infrastructure Delivery Plan. The policy will not include a minimum threshold for contributions in recognition that even the smaller sites may have an impact upon existing infrastructure which it could viably mitigate.

#### **Strategic highway infrastructure**

**6.406** With regards to managing strategic highways infrastructure, the Council considered there to be three options:

- a. Provide a policy supporting upgrades to the A2 as identified in the Department for Transport Road Investment Strategy 3 and requiring developments close to the A2 to contribute to its improvement.
- b. Include reference to site allocations which will be expected to contribute funding to the strategic highway infrastructure scheme.
- c. Relying on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**6.407** The omission of a local policy on this issue (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.408** Both options a and b have the potential to generate **significant positive** effects against SA objective 4 (transport) for the focus on securing improvements to the local strategic highway network, with associated minor positive effects against SA objectives 2 (health and well-being), 6 (air pollution) and 8 (climate change) through the more effective management of congestion and air pollution issues in the District. However, investment in the strategic road network will also facilitate more private vehicles on the District's roads, with minor adverse effects against the same four SA objectives outlined above. Investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). These effects are however uncertain as it depends on the strength of policy wording and criteria for requiring infrastructure investment.

**6.409** General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

**6.410** Similarly, the strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering

homes and new business premises have to invest in infrastructure the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

**6.411** In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

**6.412** Option b focusses exclusively on site allocations within the Local Plan. While this is likely to increase the likelihood of local investment in the strategic highway network via these allocations, other applications coming forward are more likely to be exempt from contributing. Option a on the other hand is relevant to all potential allocations and applications within the vicinity of the A2, offering greater scope for contributions over the Plan period should development occur within the immediate vicinity of the A2.

#### **Council's reasons for selecting the preferred option**

**6.413** The Council elected to include a policy supporting upgrades to the A2 because it represents the option which is likely to yield the greatest financial support for the strategic infrastructure project.

#### **The highway network and highway safety**

**6.414** With regards to managing the highway network, including highway safety, the Council considered there to be two options:

- a. Maintain the flexible approach in the existing Core Strategy, in so far as it does not set defined parameters for when Transport Assessments and Travel Plans may be required. This allows for the assessment of what constitutes a severe residual cumulative impact on the local highway to be considered on a case by case basis.
- b. Set firm thresholds for when Transport Assessment and Travel Plans are required, including distinct parameters on constitutes a severe residual cumulative impact on the local highway to inform Transport Assessments and Travel Plans.

**6.415** All options require detailed assessment of developments' highways impacts through the preparation of transport assessments and travel plans in varying circumstances, this has the potential to generate **significant positive** effects against SA objective 4 (transport) through the associated avoidance and mitigation of adverse effects on the highway network and the exploration of ways to improve it. Associated minor positive effects are recorded against SA objectives 2 (health and well-being), 6 (air pollution) and 8 (climate change through the more effective management of congestion and air pollution issues in the District).

**6.416** However, investment in the network will also facilitate more private vehicles on the District's roads, with minor adverse effects against the same four SA objectives outlined above. Investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). These effects are however uncertain as it depends on the strength of policy wording and criteria for requiring infrastructure investment. General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

**6.417** Similarly, the strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to invest in infrastructure the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.418** Option a represents a more flexible approach in so far that it put the onus on the applicant the explore the need and justify the reasoning behind a development's approach to the management of transport and travel impacts. Under option a any development could potentially require transport assessment and travel plan, whereas option b would explicitly set out which applications would require them. Although option b provides greater certainty as to when transport assessments and travel plans are required, this option has the potential to narrow the circumstances in which such assessments are required. Therefore, the Council elected to adopt a similar approach to the existing Core Strategy in the Local Plan.

### Parking provision on new development

**6.419** With regards to managing parking provision on new developments, the Council considered there to be three options:

- a. Use Kent County Council's maximum car parking standards (maximum number of parking spaces permitted) for both new residential and, where appropriate, non-residential developments across the District.
- b. Define local parking standards, including geographically tapered maximums for residential developments reflecting their location.
- c. Encourage residential development with no parking provision in appropriate locations.

**6.420** All three options have the potential to generate **significant positive** effects against SA objective 4 (transport) by helping to discourage the use of private cars in favour of more sustainable forms of transport. However, the provision of some new car parking spaces will continue to facilitate more vehicles on roads, with minor negative effects against this SA objective. Associated minor positive and minor negative effects are recorded against SA objectives 2 (health and well-being), 6 (air pollution) and 8 (climate change) through the consequently reducing and increasing traffic flows and air pollution in the District.

**6.421** A combination of options b and c are likely to yield the greatest positive effects because local criteria are likely to be more tailored to the specific needs of the District, maximising the opportunities to reduce parking areas in appropriate new developments.

### Council's reasons for selecting the preferred option

**6.422** The Council is committed to defining its own parking standards through a parking strategy review, with the potential to include geographically tapered maximums (option b). Residential development with no parking will also be encouraged in appropriate locations (option c). Ahead of this review, the Council will continue to rely on the County maximum standards (option a).

### Providing open space

**6.423** With regards to the provision of open space, the Council considered there to be four options:

- a. Rely upon the existing open space standards established within the existing Local Plan under Local Plan Policy DM27.
- b. Define new open space standards based on the latest local open space evidence.
- c. Sets out recommended higher and lower thresholds for the different Open Space typologies to be provided on or off-site.
- d. Rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**6.424** The omission of a local policy on this issue (option d) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.425** The remaining three options have the potential to generate **significant positive** effects against SA objective 2 (health and well-being) by maintaining or improving the provision of local open spaces for local residents, workers and visitors. Minor positive effects are recorded against SA objectives 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) for the potential these open spaces have of contributing to air pollution dispersal, carbon and water sequestration, urban cooling and the accessibility to and enhancement of green infrastructure the historic environment and distinctive landscapes and townscapes. These effects are however uncertain as it depends on the strength of policy wording and criteria for requiring open space provision. General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

**6.426** Similarly, the strength and breadth of open space requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to invest in open spaces, the less land available for the delivery of new homes and employment opportunities, and the more this will affect the viability and therefore the delivery of new, affordable homes and business

premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.427** A combination of options b and c are likely to yield the greatest positive effects because updated standards based on the latest evidence are likely to be more tailored to the specific needs of the District, maximising the opportunities to deliver open space where it is needed and increasing overall provision across the District.

**6.428** The Council is committed to developing its own open space standards based on new evidence (option b) and will set out recommended thresholds for different open space typologies to be provided on or off site (option c).

#### **Playing pitch strategy**

**6.429** With regards to the provision of playing pitches, the Council considered there to be four options:

- a. Require residential developments of ten or more dwellings to make financial contributions to off-site outdoor sports facilities in line with the Council's Playing Pitch Strategy.
- b. Include a lower threshold.
- c. Include a higher threshold.
- d. Instead relying on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**6.430** The omission of a local policy on this issue (option d) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.431** The remaining three options have the potential to generate **significant positive** effects against SA objective 2 (health and well-being) by making provision for sport and recreation facilities for local residents, workers and visitors. Furthermore, investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). Minor negative effects are also recorded against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to invest in the provision of sport and recreation facilities the less land available for the delivery of new homes and employment opportunities, and the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

#### **Council's reasons for selecting the preferred option**

**6.432** The lower the threshold (option b) the greater the overall financial contribution, resulting in the greatest potential for positive effects, but also an increased likelihood of adverse effects against SA objectives 1 (housing) and 3 (employment), for the reasons set out above. Conversely, the higher the threshold, the more limited the opportunity for the positive effects identified and the less the likelihood for adverse effects against SA objectives 1 (housing) and 3 (employment).

**6.433** The Council elected to use option a because it is consistent with the District's Playing Pitch Strategy developed in line with Sport England Guidance.

#### **Protection of open space**

**6.434** With regards to the protection of open space, the Council considered there to be three options:

- a. Only allow the loss of open space either following a robust assessment considering the amenity significance of existing open space and which demonstrates it is surplus to requirements or is replaced with an alternative use or facility which demonstrably provides a net benefit to the community.
- b. Designate Local Green Spaces identified through consultation with the community, in line with paragraph 100 of the NPPF.

- c. Instead relying on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**6.435** The omission of a local policy on this issue (option d) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.436** The remaining two options have the potential to generate **significant positive** effects against SA objective 2 (health and well-being) by protecting local open spaces for local residents, workers and visitors. Minor positive effects are recorded against SA objectives 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) for the likely increased importance of these open spaces for air pollution dispersal, carbon and water sequestration, urban cooling and the accessibility to and enhancement of green infrastructure the historic environment and distinctive landscapes and townscapes. Furthermore, investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). These effects are however uncertain as it depends on the strength of policy wording and criteria for requiring open space provision. General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

**6.437** Similarly, the strength and breadth of open space requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to avoid open spaces and implement measures to protect them, the less land available for the delivery of new homes and employment opportunities, and the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

**6.438** A minor negative effect is also recorded against this SA objective 2 (health and well-being) for option a because it makes provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions.

**6.439** A combination of options a and b are likely to yield the greatest positive effects, together maximising the protection of local open spaces and so minimising loss.

#### **Council's reasons for selecting the preferred option**

**6.440** The Council elected to pursue option a and not designate Local Green Spaces in the Local Plan at this stage. This is because the Council are currently unaware of any open spaces that might be suitable candidates for designation as Local Green Spaces. If open spaces suitable for designation as Local Green Spaces are identified during consultation on the Draft Local Plan, further consideration will be given to this option at the next stage in the plan-making process (during the drafting of the Proposed Submission Local Plan).

#### **Community facilities**

**6.441** With regards to the management of community facilities, the Council considered there to be two options:

- a. Include support for proposals which seek to retain or provide new community facilities and a requirement to consult with the community before applying to change community facilities.
- b. Identify those community facilities that should be protected and the specific criteria that would need to be met before they could be lost i.e. a minimum period of marketing.

**6.442** Both options have the potential to generate **significant positive** effects against SA objectives 2 (health and well-being) by protecting and maximising the protection of community services and facilities. Furthermore, investment in local infrastructure will make the District a better place to live and work, with minor positive effects on SA objectives 1 (housing) and 3 (employment). This effect is however uncertain as it depends on the strength of policy wording and criteria for protecting community facilities.

**6.443** General, high-level local policy approaches are more likely to generate minor positive effects against SA objective 2 (health and well-being). Similarly, the strength and breadth of community facility requirements are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to implement measures to protect and invest in new community facilities, the

more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain mixed minor negative and minor positive effects are recorded against these two SA objectives.

#### **Council's reasons for selecting the preferred option**

**6.444** Option b focusses exclusively on specific community facilities. While this is likely to increase the likelihood of the protection of these specific facilities, facilities not listed are likely to have less protection. Option a on the other hand is relevant to all community facilities in the District, offering greater scope for wider protection.

**6.445** The Council is committed to pursue the more comprehensive option: option a, protecting all community facilities.

#### **Digital technology**

**6.446** With regards to facilitating the provision of digital technology, the Council considered there to be three options:

- a. Require all new residential and employment development to have gigabit capable internet connections.
- b. Specify the technology to be used, such as fibre-to-the premises (FTTP).
- c. Rely on the National Planning Policy Framework, Building Regulations and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**6.447** The omission of a local policy on this issue (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

**6.448** The remaining two options have the potential to generate minor positive effects on SA objectives 1 (housing), 2 (health and well-being), 3 (employment), 4 (transport), 5 (air pollution) and 8 (climate change) by virtue of the fact they both encourage investment in digital connective, improving the standard of new homes as places to live and work, reducing the need for large proportions of the working population to travel to business premises to regularly work, contributing to less traffic congestion and associated air pollution and greenhouse gas emissions, and helping local residents and workers to maintain a better work-life balance.

#### **Council's reasons for selecting the preferred option**

**6.449** Option a represents a more flexible, outcomes focussed option when compared to option b which requires the specification of specific technologies, which may become obsolete over time. The Council is committed to pursue the most comprehensive and flexible option: option a.

#### **Transport and infrastructure policies SA**

**6.450** Table 6.7 sets out the likely effects of the Draft Local Plan transport and infrastructure policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home**

**6.451** The objective is expected to have a mixed minor positive and minor negative effect against all the policies except for DM Policy 35 (Digital Technology). This is because housing will benefit from better infrastructure, such as public and general road access, open green space, playing pitches, utilities and community facilities. The strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against this objective, as the more developers delivering homes have to invest in infrastructure, the more this will affect the viability and therefore the delivery of new, affordable homes in the District.

**6.452** DM Policy 35 (Digital Technology) is expected to have a minor positive effect as the policy encourages investment in digital connectivity, which will improve the standard of new homes as places to live and work. Investment in this infrastructure is not considered to notably affect the viability and therefore the deliverability of new homes in the District because there is a national requirement to improve digital connectivity across the country.



## **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**6.453** A **significant positive** effect is expected for the following policies against this objective:

- Strategic Policy 13: Infrastructure and Developer Contributions.
- DM Policy 31: Providing Open Space.
- DM Policy 32: Playing Pitch Strategy.
- DM Policy 34: Community Facilities.

**6.454** This is because these policies require development to provide key strategic infrastructure needs associated with new development and make improvements where appropriate. The provision of this infrastructure, services and facilities will improve resident, worker and visitor physical and mental health and well-being. A minor negative effect is also recorded for Strategic Policy 13 (Infrastructure and Developer Contributions) in acknowledgement of the fact that a significant proportion of infrastructure contributions will go to highways improvements, which will facilitate more private vehicles on the District's road network, which has the potential to increase road noise, light and air pollution in the District.

**6.455** A minor positive effect is recorded for DM Policy 35 (Digital Technology) against this objective because of improvements investment in the digital connectivity of homes and business will do to the health and well-being of people of all ages, making it easier for people to do their jobs and to access a broad range of educational and entertainment services.

**6.456** The remaining policies will have a mixed minor positive and minor negative effect against this objective. Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) record minor positive effects in acknowledgement of their focus on maintaining and improve accessibility across the District. The minor adverse effect is in acknowledgement of the fact that the policies focus on highways improvements, which will facilitate more private vehicles on the District's road network, which has the potential to increase road noise, light and air pollution in the District.

**6.457** DM Policy 33 (Protection of Open Space) is likely to have mixed minor positive and minor negative effects because it protects the District's open spaces but also sets out the scenarios in which loss of open space may be permitted, albeit in relatively rare occasions.

## **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**6.458** The objective is expected to have a mixed minor positive and minor negative effect against all the policies except for DM Policy 35 (Digital Technology).

**6.459** Strategic Policy 13 (Infrastructure and Developer Contributions), Strategic Policy 14 (Strategic Highway Infrastructure) and DM Policy 29 (The Highway Network and Highway Safety) facilitate and promote investment in new transport infrastructure, making it easier for people to access their places of work and for commerce to operate effectively and efficiently across the District, most notably in and around Dover Port and the other strategic employment sites in the District.

**6.460** DM Policy 31 (Providing Open Space), DM Policy 32 (Playing Pitch Strategy), DM Policy 33 (Protection of Open Space) and DM Policy 34 (Community Facilities) contribute to the protection and provision of important local services and facilities that contribute to making the District a better place to live and work, with minor positive effects against this objective.

**6.461** The strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against this objective, as the more developers delivering new business premises have to invest in infrastructure, the more this will affect the viability and therefore the delivery of new, affordable business premises in the District. Therefore, minor negative effects are also recorded for the majority of the policies.

**6.462** DM Policy 35 (Digital Technology) is expected to have a minor positive effect as it encourages investment in digital connectivity, improving more flexible working practices that have the potential to increase the diversity and resilience of the District's economy. Investment in this infrastructure is not considered to notably affect the viability and therefore the deliverability of new employment premises in the District because there is a national requirement to improve digital connectivity across the country.

#### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**6.463** A **significant positive** effect is expected for Strategic Policy 13 (Infrastructure and Developer Contributions) and Strategic Policy 14 (Strategic Highway Infrastructure) against this objective in acknowledgement of the fact a significant proportion of developer contributions will go towards the improvement of the District's transport infrastructure network and general connectivity, including active and more sustainable modes of travel. A minor negative effect is also recorded against Strategic Policy 14 (Strategic Highway Infrastructure) because the policy will generally facilitate the road travel, which has the potential to increase the number of vehicles on the road rather than exclusively encourage more sustainable modes of transport.

**6.464** DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) are expected to have a mixed minor positive and minor negative effect against this objective. This is because these policies support improvements to the District's highway infrastructure, which will help reduce traffic and congestion in the District. The minor adverse effect is recorded for the same reason as Strategic Policy 14 (Strategic Highway Infrastructure).

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.465** A minor positive effect is recorded for Strategic Policy 13 (Infrastructure and Developer Contributions) in acknowledgement that the policy encourages developer contributions are necessary infrastructure needed as a result of new development. This will include fund to improve the capacity and provision of water, sewage treatment and the sustainable management of waste, helping to protect and minimise the use of the District's natural resources.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**6.466** Strategic Policy 13 (Infrastructure and Developer Contributions) and DM Policy 31 (Providing Open Space) are expected to have a minor positive effect against this objective. This is because Strategic Policy 13 (Infrastructure and Developer Contributions) requires developer contributions for all kinds of needed infrastructure. Although some kinds of infrastructure are likely to facilitate increases in road vehicles, others will help to reduce congestion and associated air pollution, encourage alternative modes of the transport that minimise air pollution further or make provision for green infrastructure, which will contribute to the dispersal of air pollution, resulting in an overall net positive. DM Policy 31 (Providing Open Space) on the other hand focussed on the provision of open space, including new and improved green infrastructure, which will contribute to air pollution dispersal.

**6.467** DM Policy 33 (Protection of Open Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which help to disperse air pollution. However, the policy also sets out scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which may result in less scope to disperse air pollution in certain locations.

**6.468** Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) are expected to have mixed minor positive and minor negative effects against this objective. This is because these policies promote highway infrastructure, which will increase the number of vehicles on the District's roads and therefore their pollution generating potential, but they will also help to reduce congestion and associated air pollution and encourage alternative modes of the transport that minimise air pollution further.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**6.469** Minor positive effects are recorded for Strategic Policy 13 (Infrastructure and Developer Contributions) and DM Policy 31 (Providing Open Spaces). This is because Strategic Policy 13 (Infrastructure and Developer Contributions) requires developer contributions for all kinds of needed infrastructure. Although some kinds of infrastructure are likely to facilitate increase the urban heat island effect in the District's urban areas, reduce greenspace and increase water consumption, it is considered that the majority of infrastructure measures will contribute to minimising urban heat generation, improving water efficiency, flood risk and urban cooling through green infrastructure provision. DM Policy 31 (Providing Open Space) on the other hand focusses on the provision of open space, including new and improved green infrastructure, which will contribute to reducing the adverse effects of the urban heat island effect and flooding.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**6.470** Strategic Policy 13 (Infrastructure and Developer Contributions) and DM Policy 31 (Providing Open Space) are expected to have a minor positive effect against this objective. This is because Strategic Policy 13 (Infrastructure and Developer Contributions) requires developer contributions for all kinds of needed infrastructure. Although some kinds of infrastructure are likely to facilitate increases in road vehicles, others will help to reduce congestion and associated greenhouse gas emissions, encourage alternative modes of the transport that utilise green energy or make provision for green infrastructure, which will contribute to carbon sequestration, resulting in an overall net positive. DM Policy 31 (Providing Open Space) on the other hand focusses on the provision of open space, including new and improved green infrastructure, which will contribute to carbon sequestration.

**6.471** DM Policy 33 (Protection of Open Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which help to sequester carbon in the District before it reaches the atmosphere. However, the policy also sets out scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which may result in less scope to sequester carbon in certain locations.

**6.472** Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) are expected to have mixed minor positive and minor negative effects against this objective. This is because these policies promote highway infrastructure, which will increase the number of vehicles on the District's roads and therefore their pollution generating potential, but they will also help to reduce congestion and associated carbon emissions and encourage alternative modes of the transport that avoid direct emissions or minimise greenhouse gas emissions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**6.473** A minor positive effect is expected for Strategic Policy 13 (Infrastructure and Developer Contributions) and DM Policy 31 (Providing Open Space). This is because Strategic Policy 13 (Infrastructure and Developer Contributions) requires developer contributions for all kinds of needed infrastructure. Although some kinds of infrastructure are likely to facilitate the loss of greenspace, it is considered that the majority of infrastructure measures will contribute to maximising the potential of urban areas and therefore minimising the loss of greenfield land which is more likely to be of ecological value and, in certain locations expand, connect and improve green infrastructure provision. DM Policy 31 (Providing Open Space) on the other hand focusses on the provision of open space, including new and improved green infrastructure, which will contribute to the enhancement of the biodiversity of the District's urban areas.

**6.474** DM Policy 33 (Protection of Open Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which may contain species and habitats. However, it does make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which has the potential to reduce the extent and diversity of habitats in certain locations.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.475** DM Policy 31 (Providing Open Space) is expected to have a minor positive effect against this objective, by virtue of the fact that it promotes the provision of new and improved open spaces, which generally offer greater scope to maintain and enhance the setting and special character of the District's historic assets and landscapes.

**6.476** DM Policy 33 (Protection of Open Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space, and the loss of open space will not be permitted if open space provides the setting for important buildings or scheduled ancient monuments of historic or cultural value. However, it does make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions. This might include adverse effects to the setting of other historic assets or landscapes.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.477** A minor positive effect is expected for Strategic Policy 13 (Infrastructure and Developer Contributions) and DM Policy 31 (Providing Open Space). This is because Strategic Policy 13 (Infrastructure and Developer Contributions) requires developer contributions for all kinds of needed infrastructure. Although some kinds of infrastructure are likely to facilitate the urbanisation of urban areas, it is considered that the majority of infrastructure measures will contribute to minimising the loss of greenfield land which is more likely to be of sensitive landscape value and, in certain locations expand, connect and improve green infrastructure provision, which has the potential to improve the setting and local distinctiveness of the townscapes. DM Policy 31 (Providing Open Space) on the other hand focusses on the provision of open space, including new and improved green infrastructure, which will contribute to the enhancement of the District's landscapes and townscapes.

**6.478** DM Policy 33 (Protection of Open Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which maintain the open character and distinctiveness of parts of the District's landscapes and townscapes. However, it does make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which has the potential to have the opposite effect, reducing openness and permitting the expansion of the urban area.

Table 6.7: Likely effects of Draft Local Plan transport and infrastructure policies

Transport and Infrastructure Policies / SA Objectives	Strategic Policy 13: Infrastructure and Developer Contributions	Strategic Policy 14: Strategic Highway Infrastructure	DM Policy 29: The Highway Network and Highway Safety	DM Policy 30: Parking Provision on New Development	DM Policy 31: Providing Open Space	DM Policy 32: Playing Pitch Strategy	DM Policy 33: Protection of Open Space	DM Policy 34: Community Facilities	DM Policy 35: Digital Technology
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+
SA2: Health and well-being	++	+/-	+/-	+/-	++	++	+/-	++	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+
SA4: Transport	++	++/-	+/-	+/-	0	0	0	0	0
SA5: Resources	+	0	0	0	0	0	0	0	0
SA6: Air pollution	+	+/-	+/-	+/-	+	0	+/-	0	0
SA7: Flood risk	+	0	0	0	+	0	0	0	0
SA8: Climate change	+	+/-	+/-	+/-	+	0	+/-	0	0
SA9: Biodiversity	+	0	0	0	+	0	+/-	0	0
SA10: Historic environment	0	0	0	0	+	0	+/-	0	0
SA11: Landscape	+	0	0	0	+	0	+/-	0	0
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		0 Negligible effect likely	

### Transport and infrastructure policy recommendations

**6.479** The SA generally finds the transport and infrastructure policies of the Draft Local Plan to deliver positive effects, including significant positive effects against SA objectives 2 (health and well-being) and 4 (transport).

**6.480** The Council considered strengthening the wording for Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) to prioritise sustainable modes of transport before investment in highway infrastructure, to help offset the potential for adverse effects associated with facilitating more private vehicles on the District's road network, and the associated adverse effects against SA objectives 6 (air pollution) and 8 (climate change). It was concluded that other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects.

**6.481** The Council also considered strengthening the wording of the transport and infrastructure policies to further minimise or eliminate the scenarios in which harm to the District's environment might be permitted, for example through the loss of open spaces (i.e. through DM Policy 31 Protection of Open Spaces). Although additional wording may contribute to reducing the potential for adverse effects against SA objectives 6 (air pollution), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape), it was concluded that further safeguards may call into question the viability and/or deliverability of certain developments with further adverse, and potentially significant, effects against SA objectives 1 (housing) and 3 (employment). It is therefore considered that an appropriate balance has been struck between the two.

### Design Policies

**6.482** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define three design policies in the Draft Local Plan:

- Strategic Policy 15: Place Making.
- DM Policy 36: Achieving High Quality Design.
- DM Policy 37: Quality of Residential Development.

### Reasonable alternatives SA

**6.483** Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

**6.484** Generally, three options have been considered under each of the above design policy headers:

- a. Adopt a local approach to managing design issues and include a single policy in the Local Plan to shape place making.
- b. Adopt a local approach to managing design issues and include separate policies and/or supplementary planning guidance covering different design principles.
- c. Rely on the NPPF, PPG, Building Regulations, nationally described space standards and National Design Guide when providing planning advice and determining planning applications for development in the District.

**6.485** The omission of local policies on design issues (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance. Adopting local policies (options a and b) promoting good design and place making has the potential to generate **significant positive** effects against SA objectives 2 (health and well-being) and 11 (landscape and townscape). These effects are however uncertain as it depends on the strength of policy wording on design and place-making issues.

**6.486** General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework. Similarly, the strength and breadth of policy requirements with regards to good design are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to spend on specific local design and place making requirements the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

**6.487** Both options a and b are considered to perform equally against the SA objectives referred to above.

#### **Council's reasons for selecting the preferred option**

**6.488** The Council elected to include both a strategic place making policy in line with option a, and two more specific criteria-based design policies, as well as reference to further supplementary planning advice in line with option b. Furthermore, the Council has chosen to reiterate the nationally described space standards and to require a percentage of development to be built to building regulation M4(2) and M4(3) standard. This was for the following reasons:

- Relying on national planning policy and guidance is considered to provide an insufficient level of guidance for the management of local development design in the District.
- There is sufficient local evidence to support the viability of the nationally described space standards and building regulation M4(2) and M4(3) standard.
- In combination, the selection of these elements of the options are considered the most appropriate method for setting out a clear design vision for the District that enforces local distinctiveness.

#### **Design policies SA**

**6.489** **Table 6.8** sets out the likely effects of the Draft Local Plan design policies. The reasoning for the identification of these likely effects is set out by SA objective below.

##### **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home**

**6.490** Strategic Policy 15 (Place Making) is expected to have a mixed **significant positive** in acknowledgement of the policy's promotion of good housing development design, place making and the need to meet local housing requirements in terms of mix, tenure and type, as well as designing and planning for housing to last. Similarly, DM Policy 36 (Achieving High Quality Design) and DM Policy 37 (Quality of Residential Accommodation) are expected to have minor positive effects against this SA objective because they generally promote attractive, safe and functional housing design and place making.

**6.491** All three design policies have the potential to generate minor negative effects against this SA objective. This is because delivering these requirements has the potential to reduce the affordability of new homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

##### **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**6.492** All the design policies have the potential to generate **significant positive** effects against this SA objective.

**6.493** This is because these policies focus on achieving high-quality design that promotes sustainability, including green infrastructure and open public spaces. Strategic Policy 15 (Place Making) promotes development that is walkable or has access to public transport to access facilities and services. Development will also be well located, support a wide range of activities and encourage social interaction, along with the promotion of health, well-being and social inclusion. DM Policy 36 (Achieving High Quality Design) requires development to maintain an attractive and coherent street scene that is inclusive for all users. DM Policy 37 (Quality of Residential Accommodation) requires development to not lead to unacceptable living conditions such as, overlooking, noise, vibration, light pollution or odour. Development must also meet Building Regulations meaning it is accessible.

##### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**6.494** Strategic Policy 15 (Place Making) is expected to have a mixed **significant positive** in acknowledgement of the policy's promotion of good development design, place making and the need to meet local employment requirements in terms of mix, tenure and type. Similarly, DM Policy 36 (Achieving High Quality Design) and DM Policy 37 (Quality of Residential Accommodation) are expected to have minor positive effects against this SA objective because they generally promote attractive, safe and functional building and public realm design and place making.

**6.495** All three design policies have the potential to generate minor negative effects against this SA objective. This is because delivering these requirements has the potential to reduce the affordability of new business investments and premises and therefore their viability over the Plan period.

**SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**6.496** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are likely to generate minor positive effects against this objective because they promote sustainable and active travel by connecting development with all transport modes, which will contribute to reducing the need to travel by private vehicle and reduce road congestion. Development must also make efficient use of land and promote forms of development that are walkable. Furthermore, good place making will mean developments are near transport hubs and settlement centres.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.497** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

**6.498** This is because these policies encourage efficient use of land with high-quality design that respects the character and context of the area. As such, development will not take up more land than is required, while still meeting the Nationally Described Space Standards and Building Regulations.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**6.499** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

**6.500** This is because these policies prioritise sustainable and active travel by connecting development with all transport modes, which will contribute to reducing the need to travel by private vehicle and reduce road congestion, and associated air pollution. Walkable access to facilities and services is also encouraged. As such, good place making will mean developments are located near transport hubs or settlement centres.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**6.501** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective as they require developments to deliver flood mitigation and multifunctional greenspaces. Furthermore, the policies encourage development to protect and enhance existing features such as trees and natural habitats, which will contribute to reducing flood risk. Creating and retaining green landscapes will help to reduce the urban heat island effect in densely populated areas.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**6.502** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

**6.503** This is because development encourages sustainable and active travel, which will contribute to reducing the need to travel by private vehicle and reduce road congestion. This will lead to a reduction in air pollution, as well as greenhouse gas emissions contributing to climate change.

**SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**6.504** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective, as these policies ensure development protects and enhances natural habitats and green infrastructure. Developments are expected to provide high-quality green open spaces, incorporating trees and other planting into the public realm. Developments must also ensure that existing features, including trees, natural habitats and boundary treatments are retained, protected and enhanced.



**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.505** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective, as these policies require development to draw inspiration from traditional building form. Development must respect and enhance the existing character of an area by paying particular attention to developments location, scale, massing, rhythm, layout and use of materials appropriate to its locality. As such, development should appreciate the existing form and respond positively to it, which will have a positive effect on the historic environment.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.506** Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a **significant positive** effect against this objective, as the policies require new development to be well designed to respect and enhance local character and distinctiveness, appreciating the existing form of landscapes and townscapes, drawing inspiration from traditional building forms and using contemporary materials and design. Furthermore, development is encouraged to include enhanced green infrastructure and public realm, which will contribute significantly to the District's landscapes and townscapes.

Table 6.8: Likely effects of Draft Local Plan design policies

Design Policies / SA Objectives	Strategic Policy 15: Place Making		DM Policy 36: Achieving High Quality Design		DM Policy 37: Quality of Residential Accommodation	
SA1: Housing	++/-		+/-		+/-	
SA2: Health and well-being	++		++		++	
SA3: Employment	++/-		+/-		+/-	
SA4: Transport	+		+		0	
SA5: Resources	+		+		0	
SA6: Air pollution	+		+		0	
SA7: Flood risk	+		+		0	
SA8: Climate change	+		+		0	
SA9: Biodiversity	+		+		0	
SA10: Historic environment	+		+		0	
SA11: Landscape	++		++		0	
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+	Minor positive effect likely	+/- Mixed minor effect likely	0 Negligible effect likely

### Design policy recommendations

**6.507** The SA generally finds the design policies of the Draft Local Plan to deliver positive effects, including significant positive effects against SA objectives 2 (health and well-being) and 11 (landscape). The focus of Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) on good design and place making results in the potential for at least positive effects against all the SA objectives.

**6.508** The Council considered requiring developers to design in specific climate change mitigation and adaptation measures into development proposals to increase the potential for significant positive effects against SA objectives 7 (flood risk) and 8 (climate change). It was however concluded that this was appropriately encouraged by other policies in other chapters, specifically the climate change chapter.

### Natural Environment Policies

**6.509** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define seven natural environment policies in the Draft Local Plan:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 39: Landscape Character.
- DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy.
- DM Policy 41: Air Quality.
- DM Policy 42: Water Supply and Quality.
- DM Policy 43: The River Dour.

### Reasonable alternatives SA

**6.510** Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

**6.511** Generally, two options have been considered under each of the above natural environment policy headers:

- a. Adopt a local approach to managing natural environment issues and include policies in the Local Plan to facilitate the protection, management and enhancement of the natural environment.
- b. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.512** The omission of local policies on natural environment issues (option b) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance. Adopting local policies promoting the protection, management and enhancement of the natural environment has the potential to generate **significant positive** effects against SA objectives 2 (health and well-being), 5 (resources), 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape), acknowledging the wide range of ecosystem services that the District's natural environment provides. These effects are however uncertain as it depends on the strength of policy wording on natural environment issues.

**6.513** General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework. Similarly, the strength and breadth of policy requirements with regards to the natural environment are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to spend on the protection, management and enhancement of the natural environment the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

### Council's reasons for selecting the preferred option

**6.514** The Council elected to include local policies on the natural environment in the Local Plan to facilitate and ensure the protection, management and enhancement of the District's natural environment in line with option a. This was for the following reasons:

- Dover District has particularly rich and varied natural environment, including international, national and local designations.
- Dover District Council currently has a statutory duty to protect habitats and species of recognised European importance. The European Union Withdrawal Act (2018), section 3, states that the whole body of existing EU environmental laws will be carried over into UK law. However, recent statements issued from the Government appear to bring the future of this Act into question. A specific policy is therefore considered essential to ensure the Local Plan complies with current legislation, but also safeguards the future of the District's natural environment.
- The NPPF requires local planning policies to contribute to and enhance the natural environment and distinguish between the hierarchy of international, national and locally designated sites.
- Regular monitoring of the designated sites in the District has revealed potentially harmful levels of visitor pressure at the Dover to Kingsdown Cliffs SAC and the Thanet Coast and Sandwich Bay SPA and Ramsar sites. Under guidance from Natural England, the Council has been proactive in delivering on its legal duty to put in place measures to mitigate any potential for harm and provide positive solutions to reduce or avoid conflict between the demands of recreational pressures and the protected habitats and species.
- The landscape character of this District is unusually diverse, ranging from marine conservations zones to protected chalk grasslands. More than 20% of its land area falls within the Kent Downs AONB.
- Adopted policies DM15 and DM16 protect the countryside and landscape character in the current Plan period. Evidence demonstrates that these policies, along with the relevant paragraphs of the NPPF, are among the most frequently used in the determination of the District's planning applications and appeals.
- The NPPF requires local planning policies to contribute towards compliance with national air quality objectives, and specifically that opportunities to make improvements in air quality or to mitigate impacts should be identified at the plan-making stage. Given the District currently has two AQMAs associated with road traffic on the trunk roads leading to and from the port of Dover, a local air quality policy is considered essential.
- The NPPF requires local planning policies to deliver improvements in water quality. Notable local water quality issues include the existing water quality target failures at Stodmarsh in neighbouring Canterbury District and consequent current advice issued by Natural England of likely significant adverse effects on the integrity of the Stodmarsh European biodiversity sites.

**6.515** Other more specific policy options covered under the relevant natural environment policy headers are set out below.

### Biodiversity net gain

**6.516** With regards to achieving net gains in biodiversity, the following additional options have been considered:

- a. Adopt the mandatory minimum 10% gain requirement set out in the Environment Bill.
- b. Double the requirement to 20% as proposed by the Kent Nature Partnership.

**6.517** The more substantial biodiversity net gain requirement proposed by the Kent Nature Partnership (option d) is likely to generate more **significant positive** effects against SA objectives 2 (health and well-being), 5 (resources), 6 (air pollution), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape). Similarly, option d has greater potential for adverse effects against SA objectives 1 (housing) and 3 (employment) by virtue of the fact that it requires more from developers delivering homes and new business premises. The greater the required biodiversity enhancement, the greater the cost and the greater the likelihood of **significant negative** effects against SA objectives 1 (housing) and 3 (employment).

### Council's reasons for selecting the preferred option

**6.518** As the Council has yet to see evidence for a 20% requirement, the preferred policy option for Biodiversity Net Gain was set at 10%.

### Landscape character

**6.519** With regards to protecting and enhancing landscape character, the following additional options have been considered:

- a. A landscape character policy covering the protection and enhancement of the District's landscape character and a separate policy focussing on the Kent Downs AONB.
- b. A single landscape character policy, covering the protection and enhancement of the District's landscape character, including the Kent Downs AONB.

**6.520** Both options are considered to perform equally against the SA objectives in the SA framework, notably resulting in **significant positive** effects against SA objective 11 (landscape).

#### Council's reasons for selecting the preferred option

**6.521** The Council elected to cover the protection and enhancement of the District's landscape character in a single policy in the interests of keeping the Local Plan as concise a document as possible.

### Water supply and quality

**6.522** With regards to preserving and enhancing the District's water supply and quality, the following additional options have been considered:

- a. A policy covering the protection and enhancement of the District's water supply and quality and a separate policy focussing on the River Dour (currently included in the adopted Local Plan).
- b. A single policy covering the protection and enhancement of the District's water supply and quality, including the River Dour.

**6.523** Both options are considered to perform equally against the SA objectives in the SA framework, notably resulting in **significant positive** effects against SA objectives 5 (resources) and 7 (flood risk), and more indirect minor positive effects on the health and well-being (SA objective 2), biodiversity (SA objective 9) and landscape (SA objective 11).

#### Council's reasons for selecting the preferred option

**6.524** The Council elected to cover the protection and enhancement of the District's water supply and quality in a general policy and include a more specific policy protecting the broader sensitivities of the River Dour.

### Natural environment policies SA

**6.525 Table 6.9** sets out the likely effects of the Draft Local Plan natural environment policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**6.526** The natural environment policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies' help protect and enhance the District's natural environment, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the affordability of homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**6.527** All the natural environment policies have the potential to generate minor positive effects against this SA objective.

**6.528** Their focus on protecting, connecting and enhancing the local natural environment has direct and indirect benefit for the District's residents, workers and visitors, for example mitigating the adverse effects of climate change and facilitating physical and mental well-being. For example, improving the District's green infrastructure network will also contribute to mitigating air and water pollution, cool urban areas and connecting people to nature.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**6.529** The natural environment policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies help protect and enhance the District's natural environment, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**6.530** DM Policy 41 (Air Quality) is expected to generate a minor positive effect against this SA objective. This is because the policy acknowledges that development should be located near public transport or where walking and cycling is possible, serving to reduce the need for private car use and helping to reduce road congestion.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**6.531** DM Policy 42 (Water Quality and Supply) is expected to have a **significant positive** effect against this objective as it aims to protect water quality in the District's water bodies and courses. Furthermore, the policy requires development to minimise water use. The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 39: Landscape Character.
- DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy.
- DM Policy: The River Dour.

**6.532** This is because these policies are focussed on the enhancement of the District's natural environments, including the natural ecosystem services they provide. Although one of the key focusses of DM Policy 43 (The River Dour) is the protection of the water quality of The River Dour and its associated natural resources, its focus on a specific area restricts its influence to a smaller area in the District. Therefore, its effects are also considered to minor positive against this SA objective overall.

### SA 6: To reduce air pollution and ensure air quality continues to improve

**6.533** DM Policy 41 (Air Quality) is expected to have a **significant positive** effect against this objective.

**6.534** This is because this policy encourages development be located near public transport or where walking and cycling is possible. Development that might lead to significant deterioration in air quality or where national air quality objectives may be exceeded will require an Air Quality Assessment, helping to minimise and mitigate the effects of poor air quality.

### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**6.535** DM Policy 42 (Water Quality and Supply) is expected to have a **significant positive** effect against this objective, as it aims to minimise water use in future developments and protect water resources, such as Groundwater Protection Zones. The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 39: Landscape Character.
- DM Policy 43: The River Dour.

**6.536** This is because these policies directly promote climate change adaptation through sustainable design and investment in green infrastructure, which will contribute to the climate change resilience of the District's natural environments and urban areas. Although one of the key focusses of DM Policy 43 (The River Dour) is to maintain river flow and capacity, its focus on a specific

area restricts its influence to a smaller area. Therefore, its effects are also considered to minor positive against this SA objective overall.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**6.537** The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 39: Landscape Character.
- DM Policy 41: Air Quality.

**6.538** This is because these policies directly promote climate change mitigation either through encouraging low emission lifestyles or carbon sequestration through the enhancement of the District's green infrastructure network.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**6.539** The following natural environment policies have the potential to generate **significant positive** effects against this SA objective by virtue of the fact they are focussed on the protection and enhancement of the District's wildlife assets and sensitive areas:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy.

**6.540** A minor negative effect is also recorded against this SA objective for Strategic Policy 16 (Protecting the District's Hierarchy of Designated Environmental Sites). This is because the policy sets out the scenarios in which adverse effects on national and local biodiversity assets may be permitted, albeit in relatively rare occasions.

**6.541** The remaining natural environment policies have the potential to generate minor positive effects against this SA objective:

- DM Policy 39: Landscape Character.
- DM Policy 41: Air Quality.
- DM Policy 42: Water Quality and Supply.
- DM Policy 43: The River Dour.

**6.542** This is because DM Policy 39 (Landscape Character) promotes the protection and enhancement of landscape character, which includes wildlife habitats, trees and woodland. DM Policy 42 (Water Quality and Supply) and DM Policy 43 (The River Dour) aim to protect local water bodies and courses which make a significant contribution to the quality and diversity of the District's wildlife habitats. DM Policy 41 (Air Quality) helps to avoid and minimise the deterioration of the District's air quality and its adverse effects on the District's biodiversity assets.

#### SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment

**6.543** Strategic Policy 16 (Protecting the District's Hierarchy of Designated Environmental Sites) and DM Policy 39 (Landscape Character) are expected to have a minor positive effect against this SA objective. Both policies require the protection of the District's historic natural landscapes and seascapes, such as the heritage coast and Kent Downs AONB.

#### SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside

**6.544** DM Policy 39 (Landscape Character) has the potential to generate **significant positive** effects against this SA objective because it focusses on the protection and enhancement of the District's natural and historic landscape and townscape character.

**6.545** Other natural environment policies have the potential to generate more minor positive effects against this SA objective:

- Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites.
- Strategic Policy 17: Green Infrastructure and Biodiversity.
- DM Policy 38: Biodiversity Net Gain.
- DM Policy 40: Thanet Coast and Sandwich Bay SPA.
- DM Policy 42: Water Quality and Supply.
- DM Policy 43: The River Dour.

**6.546** This is because these policies promote the protection and enhancement of the District's natural land and waterscapes, as well as the protection of designated sites and green infrastructure which contribute to them.



Table 6.9: Likely effects of Draft Local Plan natural environment policies

Natural Environment Policies / SA Objectives	Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites	Strategic Policy 17: Green Infrastructure and Biodiversity	DM Policy 38: Biodiversity Net Gain	DM Policy 39: Landscape Character	DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy	DM Policy 41: Air Quality	DM Policy 42: Water Quality and Supply	DM Policy 43: The River Dour
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and well-being	+	+	+	+	+	+	+	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	0	0	0	0	0	+	0	0
SA5: Resources	+	+	+	+	+	0	++	+
SA6: Air pollution	0	0	0	0	0	++	0	0
SA7: Flood risk	+	+	+	+	0	0	++	+
SA8: Climate change	+	+	+	+	0	+	0	0
SA9: Biodiversity	++/-	++	++	+	++	+	+	+
SA10: Historic environment	+	0	0	+	0	0	0	0
SA11: Landscape	+	+	+	++	+	0	+	+
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		0 Negligible effect likely

### Natural environment policy recommendations

**6.547** The SA generally finds the natural environment policies of the Draft Local Plan to deliver positive effects, including **significant positive** effects against SA objectives 4 (resources), 6 (air pollution), 7 (flood risk), 9 (biodiversity) and 11 (landscape).

**6.548** The Council considered strengthening the wording of Strategic Policy 16 (Protecting the District's Hierarchy of Designated Environmental Sites) in order to further minimise or eliminate the scenarios in which substantial harm to the District's natural environment might be permitted. It was however concluded that stronger wording would further call into question the viability and/or deliverability of certain developments with further adverse, and potentially significant, effects against SA objectives 1 (housing) and 3 (employment). It is therefore considered that an appropriate balance has been struck between the two.

### Historic Environment Policies

**6.549** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define six historic environment policies in the Draft Local Plan:

- Strategic Policy 18: Protecting the District's Historic Environment.
- DM Policy 44: Designated and Non designated heritage assets.
- DM Policy 45: Conservation Areas.
- DM Policy 46: Archaeology.
- DM Policy 47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area.
- DM Policy 48: Historic Parks and Gardens.

### Reasonable alternatives SA

**6.550** Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

**6.551** Generally, generally three options have been considered under each of the above historic environment policy headers:

- a. Adopt a local approach to managing historic environment issues and include a single policy in the Local Plan to facilitate the protection, management and enhancement of the historic environment.
- b. Adopt a local approach to managing historic environment issues and include separate policies covering different distinct types of historic asset in the Local Plan to facilitate the protection, management and enhancement of the historic environment.
- c. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

**6.552** The omission of local policies on historic environment issues (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance. Adopting local policies (options a and b) promoting the protection, management and enhancement of the natural environment has the potential to generate **significant positive** effects against SA objectives 2 (health and well-being), 10 (historic environment) and 11 (landscape). These effects are however uncertain as it depends on the strength of policy wording on historic environment issues.

**6.553** General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework. Similarly, the strength and breadth of policy requirements with regards to the historic environment are equally likely to influence the likelihood for negative effects against SA objectives 1 (housing) and 2 (employment). This is because the more developers delivering homes and new business premises have to spend on the protection, management and enhancement of the historic environment the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District. In the absence of any firm details on the likely nature and breadth of such a local planning policy at this stage in the policy development process, uncertain minor negative effects are recorded against these two SA objectives.

**6.554** Both options a and b are considered to perform equally against the SA objectives referred to above.

### **Council's reasons for selecting the preferred option**

**6.555** The Council elected to include a series of local policies on the historic environment in the Local Plan, covering different types of historic asset separately in line with option b. This was for the following reasons:

- The NPPF requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- Given the exceptional wealth and diversity of the heritage assets that Dover District enjoys, policies for different categories of heritage assets is the preferred approach, with the exception of including a standalone policy for the one protected wreck site in the District, which it was felt would be adequately covered by other policies.
- There is a substantial evidence base for the Dover Western Heights fortifications and therefore a separate policy for this important site is considered appropriate.
- Following the Council's declaration of a climate change emergency and commitment to the delivery of a carbon neutral District by 2050, it is considered important that the Local Plan guide proposals for energy efficiency improvements to heritage assets in order to ensure that their heritage significance is sufficiently protected. Current advice from Historic England, which requires clear adoption of a 'whole building' approach, forms the basis of the preferred approach covered in DM Policy 44 (Designated and Non-designated Heritage Assets).

### **Historic environment policies SA**

**6.556 Table 6.10** sets out the likely effects of the Draft Local Plan historic environment policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home**

**6.557** Strategic Policy 18 (Protecting the District's Historic Environment), DM Policy 44 (Designated and Non-designated Heritage Assets), DM Policy 45 (Conservation Areas) and DM Policy 48 (Historic Parks and Gardens) have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies' help protect and enhance the local character and distinctiveness of the District, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the affordability of homes and/or their viability over the Plan period, with minor negative effects against this SA objective. A minor negative effect is recorded against DM Policy 46 (Archaeology) for the same reason.

#### **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**6.558** All historic environment policies have the potential to generate a minor positive effect against this SA objective by virtue of the fact that they all promote the protection, enhancement and accessibility of the District's historic environment, contributing to the education, enjoyment and general well-being of local residents, workers and visitors.

#### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**6.559** Strategic Policy 18 (Protecting the District's Historic Environment), DM Policy 44 (Designated and Non-designated Heritage Assets), DM Policy 45 (Conservation Areas), DM Policy 47 (Dover Western Heights Fortifications) and DM Policy 48 (Historic Parks and Gardens) have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies' help protect and enhance the local character and distinctiveness of the District, maintaining it as a nice place to live, work and visit.

**6.560** DM Policy 47 (Dover Western Heights Fortifications) encourages the optimisation of opportunities on the site to enhance the economic well-being of the town, such as attracting visitors into the local area, as well as securing jobs maintaining assets and through tourism. However, delivering these local requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective. A minor negative effect is recorded against DM Policy 46 (Archaeology) for the same reason.

**SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**6.561** DM Policy 45 (Conservation Areas) and DM Policy 47 (Western Heights Fortifications) have the potential to generate minor positive effects against this SA objective. DM Policy 45 (Conservation Areas) discourages unacceptable levels of traffic or parking in Conservation Areas. DM Policy 47 (Western Heights Fortifications) encourages improvements of the connectivity between the fortifications and the town centre, Dover Priory railway and Dover waterfront. Therefore, both have the indirect benefit of helping to reduce the number of private vehicles in the District's historic settlements.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**6.562** All historic environment policies are expected to have a negligible effect against this objective.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**6.563** DM Policy 45 (Conservation Areas) and DM Policy 47 (Western Heights Fortifications) have the potential to generate minor positive effects against this objective. DM Policy 45 (Conservation Areas) discourages unacceptable levels of traffic or parking in Conservation Areas. DM Policy 47 (Western Heights Fortifications) encourages improvements of the connectivity between the fortifications and the town centre, Dover Priory railway and Dover waterfront. Therefore, both have the indirect benefit of helping to reduce the number of private vehicles in the District's historic settlements, reducing emissions and air pollution in these locations.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**6.564** All historic environment policies are expected to have a negligible effect against this objective.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**6.565** DM Policy 45 (Designated and Non-designated Heritage Assets) is expected to have a minor positive effect against this SA objective because it promotes the sensitive energy efficiency improvements to historic assets and buildings using a whole building approach, including an assessment of the suitability of the proposed measures based on the construction history of the property and its heritage significance.

**SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**6.566** All but one of the historic environment policies are expected to have a minor positive effect against this SA objective because they generally encourage the protection and enhancement of the natural environment as it relates to the setting, significance and resilience of the District's historic environment.

**6.567** The notable exception is DM Policy 46 (Archaeology) which is generally concerned with below ground and water historic assets. A negligible effect is therefore recorded for this policy.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**6.568** All historic environment policies are expected to have a **significant positive** effect against this objective. This is because the policies are focussed on the conservation, interpretation, promotion and enhancement of the District's historic environments and assets. A minor negative effect is also recorded against this SA objective for DM Policy 44 (Designated and Non-Designated Heritage Assets). This is because the policy sets out the scenarios in which loss or substantial harm to the significance of heritage assets may be permitted, albeit in relatively rare occasions.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**6.569** All of the historic environment policies are expected to have a **significant positive** effect against this SA objective because they generally promote conservation and enhancement of historic environments and the restoration of the District's heritage assets, which will directly help protect and enhance the District's landscapes and townscapes.

Table 6.10: Likely effects of Draft Local Plan historic environment policies

Historic Environment Policies / SA Objectives	Strategic Policy 18: Protecting the District's Historic Environment	DM Policy 44: Designated and Non-designated Heritage Assets	DM Policy 45: Conservation Areas	DM Policy 46: Archaeology	DM Policy 47: Dover Western Heights Fortifications	DM Policy 48: Historic Parks and Gardens
SA1: Housing	+/-	+/-	+/-	-	0	+/-
SA2: Health and well-being	+	+	+	+	+	+
SA3: Employment	+/-	+/-	+/-	-	+/-	+/-
SA4: Transport	0	0	+	0	+	0
SA5: Resources	0	0	0	0	0	0
SA6: Air pollution	0	0	+	0	+	0
SA7: Flood risk	0	0	0	0	0	0
SA8: Climate change	0	+	0	0	0	0
SA9: Biodiversity	+	+	+	0	+	+
SA10: Historic environment	++	++/-	++	++	++	++
SA11: Landscape	++	++	++	++	++	++
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+ Minor positive effect likely	+/- Mixed minor effect likely	- Minor negative effect likely	0 Negligible effect likely

### Historic environment policy recommendations

**6.570** The SA generally finds the historic environment policies of the Draft Local Plan to deliver positive effects, including **significant positive** effects against SA objectives 10 (historic environment) and 11 (landscape).

**6.571** The Council considered strengthening the wording of DM Policy 44 (Designated and Non-designated Heritage Assets) to further minimise or eliminate the scenarios in which substantial harm to the District's historic environment might be permitted. It was however concluded that stronger policy wording could further call into question the viability and/or deliverability of certain developments with further adverse, and potentially significant, effects against SA objectives 1 (housing) and 3 (employment). It is considered that an appropriate balance has been struck between the two.

# Chapter 7

## Publication Local Plan Sustainability Appraisal

**7.1** This chapter sets out and appraises the contents of the Regulation 19 Publication Local Plan, as well as the additional reasonable alternative options not considered in **Chapter 6**.

**7.2** The options considered during the preparation of the Regulation 18 Draft Local Plan and their reasonableness are reported in **Chapter 6**.

### Additional Reasonable Alternatives

**7.3** Additional reasonable alternatives identified during the preparation of the Publication Local Plan (Regulation 19) are outlined and appraised below, along with appropriate justification for the selection of the final policy.

**7.4** Where final policies have remained largely unchanged since the appraisal of the preferred options in the Draft Local Plan (Regulation 18), justification for the selection of the final policy has not been repeated and can be found in **Chapter 6**.

### Outline of the Structure and Contents of the Publication Local Plan

**7.5** The Regulation 19 Publication Local Plan sets out Dover District's Council's overarching vision and associated strategic objectives for Dover District up to 2040. The strategic policies within the Publication Local Plan set out how this will be delivered and strategic and non-strategic housing and employment allocations are identified, before setting out how development will be managed through development management policies on: climate change, planning for healthy and inclusive communities, new homes, employment and the local economy, retail and town centres, transport and infrastructure, the natural environment and the historic environment. Each element of the Plan is set out in further detail alongside its appraisal in the subsequent sections of **Chapter 7**.

**7.6** The policies plan to deliver the District's housing needs (a minimum of 10,998 new homes) and economic aspirations, maximising their benefits and managing their sensitivities to avoid and minimise adverse effects on the environment and health and well-being.

**7.7** Housing growth is distributed across the District, with notable concentrations of allocations in the District's largest existing settlements, most notably Dover Town and neighbouring Whitfield. Other strategic housing allocations include land to the south of Aylesham and land in between Eythorne and Elvington.

**7.8** Employment growth is generally focussed within established employment sites distributed across the District, with notable concentrations in Dover and to the north of Sandwich.

### Approach to the Appraisal of the Publication Local Plan

**7.9** The appraisal in this chapter is broadly structured in the same way as the Regulation 19 Publication Local Plan, taking each chapter in turn. The one notable difference is that the Publication Local Plan separates out the Local Plan's strategic policies from the rest of the plan, whereas the appraisals present the effects of the strategic policies alongside their sibling development management policies to illustrate the synergies between them.

**7.10** Each section starts with a summary of the scope of a Publication Local Plan chapter's contents. Consideration is then given to the additional options that have not previously been considered in the preparation of the Regulation 18 Draft Local Plan and appraised in **Chapter 6** for each policy and their reasonableness. The additional reasonable options considered in the definition of each policy are appraised against the SA objectives in the SA framework, with a focus on identifying the likely variations in their significant effects. The Council's justification for the selection of the final policy is provided after each appraisal.

**7.11** The final contents of each chapter – the vision, strategic objectives, strategic policies, site allocation policies or development management policies – are then appraised against the SA framework, highlighting the significant effects of each policy in the chapter under each SA objective. A summary table illustrating the likely effects of all policies is provided for each chapter.

**7.12** Reference is made to any notable changes to the policy as a result of recommendations made during the SA of the relevant preferred Draft Local Plan (Regulation 18) policies and their reasonable alternatives. Where appropriate, each section ends with a list of updated recommendations as to how significant negative effects could be avoided or mitigated and positive effects could be enhanced and/or uncertain effects removed.

## Vision and Strategic Objectives

**7.13** The overarching vision for Dover District in 2040 is:

*‘Dover District in 2040 will be a place of aspiration, providing outstanding opportunities for sustainable living. Initiatives to mitigate against, and adapt to, the climate change emergency will have been undertaken to build resilience across the built and natural environments of the District across the lifetime of the Plan. Through careful stewardship of its world class landscapes, thriving natural environments and wealth of historic sites, Dover District will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience. Community spirit will be strong amongst the residents of the District, with an increased sense of health and well-being.’*

**7.14** The overarching vision is supported by four other themed visions, used as a framework for 17 strategic objectives:

- **Spectacular and Sustainable Environment:** Above all, the District will be defined by its enviable countryside and coastal environments. The climate change emergency will have resulted in increased local food production, extensive tree planting, and the adoption of sustainable design and construction methods. From the iconic White Cliffs to the nationally valued chalk downlands of the Kent Downs AONB, international, national and locally protected landscapes, wildlife sites, habitats and species will have been protected and enhanced. Air quality and biodiversity will have been improved, and a net gain delivered in biodiversity, as the District achieves significant progress to becoming net zero carbon.
- **Prosperous Economy:** The local economy will be prosperous and diverse, harnessing the world class potential of the Port of Dover and Discovery Park and building upon the key sectors of life sciences, pharmaceuticals, manufacturing and logistics, digital, creative and cultural development, tourism and the visitor economy, as well as local enterprise and entrepreneurial talent. The District will have attracted new businesses of all scales, with 21<sup>st</sup> century infrastructure, unrivalled transport connections with London and Europe, alongside home working facilities. Dover will be a District that domestic and international visitors want to spend time in, taking advantage of a diverse range of high-quality accommodation, attractions and unique experiences and building upon the world-famous White Cliffs and iconic Dover Castle.
- **Vibrant Communities:** New developments will blend seamlessly with the existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District. New housing will enhance towns and villages, delivering a balanced and resilient housing market, a supply of new homes that meets people’s needs and where affordable and local housing is prioritised. Residents will have access to healthy lifestyle opportunities that the District’s high-quality countryside and maritime landscapes provide, including extensive and attractive public green spaces and an enhanced network of dedicated walking and cycling routes, as well as improved educational opportunities and leisure and community services.
- **Thriving Places:** The towns and villages of the District will enjoy improved infrastructure and services, including social and community facilities and accessible, attractive areas of public open space, enhancing the health and well-being of residents and improving the quality of life for those living and working here. The urban expansion of Whitfield identified as a strategic allocation in the Dover Core Strategy 2010 will continue during the lifetime of this Local Plan and beyond and will deliver a resilient and sustainable community around a landscape and biodiversity rich framework that advocates healthy and active living. Dover town will be thriving, with a strong core of local shops and services, a flourishing port, and regenerated areas of existing housing. Sensitive restoration of elements of its rich heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making. The distinctive historic environments of the towns of Deal and Sandwich will be protected and enhanced, their economies benefiting from a wide range of local businesses and



services as well as investment in culture. The rural villages of the District will continue to enrich the landscapes here, with improved community facilities and housing opportunities, enabling more young people to stay and contribute to the communities where they grew up.

**7.15 Table 7.1** sets out the strategic objectives, as well as their relationship with the Vision Themes and policies within the Publication Local Plan.

**Table 7.1: Publication Local Plan vision themes and strategic objectives**

Vision Themes	Strategic Objectives	Relevant Publication Local Plan Policy Chapters
Spectacular and Sustainable Environment	To respond to the challenges of the climate emergency, ensuring that all new development is designed to adapt to, and mitigate against, the effects of climate change, including by reducing carbon emissions, increasing energy efficiency, and through the integration of design and construction features that enable resilience to the harmful effects of climate change.	Climate Change Place Making Natural Environment Historic Environment
	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.	
	To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and the positive role they can play in the regeneration of the District.	
	To conserve and enhance the District's biodiversity and green infrastructure, including international, national and locally protected landscapes and coastlines, all designated wildlife sites, priority habitats and species and to enhance ecological connectivity between them, delivering a net gain in biodiversity.	
	To conserve and enhance the District's important natural landscapes and water environments, to ensure these assets can continue to be experienced and valued by residents and visitors and are protected from inappropriate development.	
	To ensure the District's natural resources are used prudently, waste is minimised, and environmental pollution is reduced or avoided.	
Prosperous Economy	To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.	Employment and Local Economy Retail and Town Centres Transport and Infrastructure
	To support opportunities to strengthen the role of Dover, Deal and Sandwich town centres through their diversification, enhancement and improvements to the public realm.	
	To provide a range of high-quality tourism and visitor facilities, accommodation and infrastructure, which facilitate the growth of the tourism and visitor economy sector and encourage more visits and longer stays.	
Vibrant Communities	To provide greater choice of high-quality housing to meet the needs of Dover District's growing population and changing demographic, and address affordability issues.	Housing Place Making

Vision Themes	Strategic Objectives	Relevant Publication Local Plan Policy Chapters
	<p>To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.</p> <p>To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which promote local distinctiveness and a sense of place.</p> <p>To provide new and improved community infrastructure and assets, including open space and sports facilities to meet the needs of the District's communities.</p>	Transport and Infrastructure
Thriving Places	<p>To support improvements in the health and well-being of residents, improve quality of life for all and reduce health inequalities through high quality place making, including the provision of high-quality green infrastructure and access to attractive areas of public open spaces in the built up areas of the District.</p> <p>To improve connectivity and movement through significantly enhancing the provision of walking and cycling routes and other sustainable modes of transport, as well as delivering improvements to the local and strategic road network.</p> <p>To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.</p> <p>To work with the Council's partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District's people and places.</p>	Place Making Transport and Infrastructure Natural Environment

### Reasonable alternatives SA

**7.16** The vision and strategic objectives have been informed by the Local Plan evidence base, the Council Corporate Plan and several Local Plan workshops held over the past two years and culminating the Virtual Visioning Event held on the 30<sup>th</sup> July 2020. The vision is considered to comprehensively cover the issues and aspirations collected, whilst remaining locally specific. Therefore, there are considered to be no reasonable alternatives at this stage.

### Draft vision and strategic objectives SA

**7.17 Table 7.2** sets out the likely effects of the Publication Local Plan vision and strategic objectives. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.18** The vision is likely to have a **significant positive** effect against this SA objective because it promotes the delivery of a diverse range of high-quality accommodation that meets local needs, while prioritising affordability. In addition, the vision highlights that the urban expansion of Whitfield (a strategic site allocation) will deliver a resilient and sustainable community.

**7.19** The strategic objective promoting housing choice and affordability is also likely to generate a **significant positive** effect against this SA objective. Minor positive effects are also acknowledged because the majority of the other strategic objectives promote good place-making that will benefit existing and new residents, as well as the long-term resilience of the local housing market. Many of the strategic objectives promote higher-quality, more sustainable and attractive developments that contribute to and invest in local communities' services, facilities and infrastructure. Delivering all these requirements has the potential to

reduce the affordability of new homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

### **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**7.20** The vision is likely to have a **significant positive** effect against this SA objective because it promotes the health and well-being of the District's resident's workers and visitors through: the safeguarding and enhancement of the District's natural and historic assets; regeneration and the diversification of the local economy and community services and facilities; high-quality design of development and public realm; the promotion of active and other sustainable forms of transport; and, recreation and climate change resilience. In addition, the vision highlights that the urban expansion of Whitfield (a strategic site allocation) will deliver a resilient and sustainable community that advocates healthy and active living, having positive effects on the health and wellbeing of its residents. Furthermore, provision of services and facilities provided as part of the development will help reduce inequality, poverty and social exclusion.

**7.21** The majority of the strategic objectives are likely to generate **significant positive** effects against this SA objective because the majority of them promote investment in local facilities and services, including ecosystem services, and cultural and economic assets that will directly or indirectly improve the health and well-being of local residents, workers and visitors. The strategic objectives that are not considered likely to generate significant positive effects are still acknowledged to have the potential to generate indirect positive effects by virtue of their contribution to the District's economy and services.

### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**7.22** The vision is likely to have a **significant positive** effect against this objective because it promotes a prosperous and diverse economy, strengthening the District's successful economic centres, sectors and tourist attractions, and investing in District's transport network and home working facilities.

**7.23** The strategic objectives promoting the growth and diversity of the economy and the growth of tourism are likely to generate a **significant positive** effect against this SA objective. Minor positive effects are also acknowledged because the majority of the other strategic objectives promote good place-making that will benefit existing and new workers and businesses, as well as the long-term resilience of the local economy. Many of the strategic objectives promote higher-quality, more sustainable and attractive developments that contribute to and invest in local communities' services, facilities and infrastructure. Delivering all these requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.24** The vision is likely to have a **significant positive** effect against this objective because it promotes the delivery of unrivalled transport connections with London and Europe, an enhanced network of dedicated walking and cycling routes and improved connections to the seafront. In addition, the vision highlights that the delivery of a community at the urban expansion of Whitfield should advocate health and active living, such as active travel.

**7.25** The strategic objectives focusing on the regeneration and investment in the connectivity, diversity and accessibility of the District's regional and local centres are likely to generate **significant positive** effects against this objective.

**7.26** Several of the other strategic objectives promoting climate change resilience, the improvement of community infrastructure, health and well-being and air pollution reduction are likely to generate indirect minor positive effects against this objective by virtue of the fact that all these causes will involve investment in and sustainable travel and traffic congestion alleviation. Mixed minor positive and minor negative effects are recorded in relation to the strategic objectives promoting the growth and diversification of the local economy and tourism because this will likely increase the amount of traffic on the District's roads but will also result in investment in the sustainable connectivity and accessibility of the District.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.27** The vision is likely to have a **significant positive** effect against this objective because it promotes the safeguarding of the District's natural environments and increase opportunities for local food production, tree planting and the adoption of sustainable design and construction methods. With reference to the urban expansion of Whitfield, the vision highlights that the development of a new community should be delivered in a sustainable manner, which could include sustainable design and construction methods.

**7.28** The strategic objectives focussed on the regeneration of the District's existing regional and local centres, including brownfield land, minimises resource use and safeguard the open countryside are likely to generate **significant positive** effects against his SA objective. Similarly, the strategic objectives that promote the protection of the District's natural environment, sustainable design and construction and investment in existing centres are considered to generate indirect minor positive effects against this objective.

**7.29** The strategic objectives that promote the growth and diversification of the District's economy and the delivery of homes have the potential to generate minor negative effects against this SA objective, given that the scale of growth required is likely to result in the loss of at least some greenfield land and its natural resources.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.30** The vision is likely to have a **significant positive** effect against this objective because it promotes health and well-being and air quality improvements.

**7.31** The strategic objective that promotes the minimisation of air pollution is likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and investment in existing centres and their sustainable and active transport connections and accessibility are considered to generate indirect minor positive effects against this objective.

**7.32** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the number of vehicles on the District's road network.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.33** The vision is likely to have a **significant positive** effect against this objective because it promotes extensive tree planting and sustainable design and construction methods. In particular, the vision promotes the delivery of a resilient and sustainable community at the urban expansion of Whitfield strategic allocation.

**7.34** The strategic objectives that promote climate change adaptation and the management of local flood risk are likely to generate **significant positive** effects against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network and the health and well-being of residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**7.35** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the density of urban areas and increase the likelihood that some greenspace within and adjacent to established settlements will be lost to development.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.36** The vision is likely to have a **significant positive** effect against this objective because it promotes sustainable and active transport modes, sustainable design and construction methods and significant progress to becoming a net zero carbon District. In particular, the vision promotes the delivery of sustainable communities which advocates active living in relation to the urban expansion of Whitfield, which will encourage reduced use of domestic and transport related greenhouse gas emissions.

**7.37** The strategic objectives that promote climate change mitigation and the regeneration and investment in the District's existing regional and local centres, limiting the need for larger portions of the population to travel by road and increasing the viability of energy efficiency, low carbon and renewable energy schemes, are likely to generate **significant positive** effects

against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network and the health and well-being of residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**7.38** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the consumption of water and fossil fuels in the District, at least in the short to medium term before the District realises its net zero carbon ambitions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.39** The vision is likely to have a **significant positive** effect against this objective because it promotes the protection of the District's spectacular natural environments, including the protection and enhancement of its wildlife habitats. In particular, the vision outlines that the development of a community at the urban expansion of Whitfield strategic allocation should be delivered around a biodiversity rich framework.

**7.40** The strategic objective that promotes the protection and enhancement of the District's ecological assets is likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of the District's green infrastructure network, including wider natural landscapes are considered to generate indirect minor positive effects against this objective.

**7.41** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes have the potential to generate minor negative effects against this SA objective, given these activities are likely to increase the disturbance of ecological assets, through potential increases in air, noise and water pollution, recreation pressures on established and vulnerable habitats and habitat loss where development occurs on greenfield land.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.42** The vision is likely to have a **significant positive** effect against this objective because it promotes the careful stewardship of the District's historic assets through the sensitive restoration of its rich heritage. With reference to the urban expansion of Whitfield, the vision identifies that the delivery of a community here should consider the local landscape, which could have benefits on the historic environment and setting of historic assets.

**7.43** The strategic objectives that promote high quality design that promote local distinctiveness and the conservation and enhancement of historic assets are likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the health and well-being of local residents, workers and visitors are considered to generate indirect minor positive effects against this objective.

**7.44** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes, including the potential densification of local regional and local centres have the potential to generate minor negative effects against this SA objective, given these activities are likely to be in close proximity to historic assets where there is potential to affect their significance and setting. It is however acknowledged that the regeneration of existing historic settlements, including their public realm may result in the positive effects too.

**7.45** The strategic objective promoting climate change mitigation is likely to result in increased investment in energy efficiency and low carbon and renewable technologies in historic settlements, including on and in close proximity to historic assets which may result minor adverse effects to their setting and/or significance, but will also help to secure their resilience to climate change in the long term.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.46** The vision is likely to have a **significant positive** effect against this objective because it promotes the protection of the District's spectacular natural environments, including world class landscapes, such as the iconic White Cliffs, chalk downlands and Kent Downs AONB. With reference to the urban expansion of Whitfield, the vision identifies that the delivery of a community here should consider the local landscape.

**7.47** The strategic objectives that promote high quality design that promote the protection and enhancement of the District's landscapes, seascapes and local distinctiveness and the conservation and enhancement of historic assets are likely to generate a **significant positive** effect against this SA objective. Similarly, the strategic objectives that promote sustainable design and construction and the protection and enhancement of green infrastructure in the urban and rural areas are considered to generate indirect minor positive effects against this objective.

**7.48** The strategic objectives that promote the growth and diversification of the District's economy, tourism and the delivery of homes, including the potential densification of local regional and local centres have the potential to generate minor negative effects against this SA objective, given these activities have the potential to be within and in close proximity to sensitive landscapes and townscapes. It is however acknowledged that the regeneration of established centres may result in the positive effects too.

**7.49** The strategic objective promoting climate change mitigation is likely to result in increased investment in energy efficiency and low carbon and renewable technologies in existing urban areas and in the open countryside, which may result minor adverse effects to the District's landscapes and townscapes but will also help to secure their resilience to climate change in the long term.

Table 7.2: Likely effects of Publication Local Plan vision and strategic objectives

Vision and Strategic Objectives / SA Objectives	Vision	Strategic Objectives																	
		Prosperous Economy			Vibrant Communities				Spectacular and Sustainable Environment						Thriving Places				
		Grow and diversify economy	Improve town centres	Grow tourism and visitor economy	Promote housing choice and affordability	Regeneration and accessibility	Quality design	Improve community infrastructure	Mitigate and adapt to climate change	Reduce and manage flood risk	Conserve and enhance historic assets	Conserve and enhance biodiversity	Conserve and enhance landscapes/seascapes	Minimise resource use, waste and pollution	Improve health and well-being for all	Improve sustainable connectivity	Deliver infrastructure on time	Capture development value and minimise impact	
SA1: Housing	++	0	+	-	++	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	+/-	+/-	
SA2: Health and well-being	++	+	++	+	++	++	++	++	++	++	++	++	++	++	++	++	++	++	
SA3: Employment	++	++	+	++	+	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	
SA4: Transport	++	+/-	++	+/-	0	++	0	+	+	0	0	0	0	0	+	+	++	+	+
SA5: Resources	++	-	+	0	-	++	+	0	+	+	0	+	++	++	0	0	0	+	
SA6: Air pollution	++	-	+/-	-	-	+	0	+	+	0	0	+	0	++	+	+/-	+	+	
SA7: Flood risk	++	-	+/-	0	-	+	+	+	++	++	0	+	+	+	+	+	+	+	
SA8: Climate change	++	-	++	-	-	+	+	0	++	0	0	+	+	+	+	++	+	+	
SA9: Biodiversity	++	-	+	-	-	+	+	+/-	+	+	0	++	+	+	+	+	+	+	
SA10: Historic environment	++	-	+/-	+/-	-	+/-	++	0	+/-	+	++	0	+	+	+	+	0	+	
SA11: Landscape	++	-	+/-	+/-	-	+/-	++	0	+/-	+	++	+	++	+	+	+	0	+	
<b>Key</b>	++ Significant positive effect likely			+ Minor positive effect likely				+/- Mixed minor effect likely				- Minor negative effect likely			0 Negligible effect likely				

## Vision and strategic objectives recommendations

**7.50** The SA finds the vision and strategic objectives of the Publication Local Plan to be suitably comprehensive and ambitious to generate the potential of the Local Plan to deliver **significant positive** effects against all SA objectives in the SA framework, whilst also minimising adverse effects. Therefore, no recommendations are made.

## Strategic and Non-Strategic Housing, Employment and Mixed-Use Allocation Policies

**7.51** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define 55 strategic and non-strategic housing, employment and mixed-use allocation policies in the Publication Local Plan:

### Strategic housing allocation policies

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 24: Land to the South of Aylesham (AYL003r2).
- Site Allocation Policy 28: Land between Eythorne and Elvington (EYT003, EYT009 and EYT012).

### Strategic employment allocation policies

- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 5: Fort Burgoyne (TC4S092).
- Site Allocation Policy 25: Aylesham Development Area (4 – Aylesham Development Area).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).

### Strategic mixed-use allocation policies

- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).

### Non-strategic housing allocation policies

- Site Allocation Policy 8: Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022Br).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).
- Site Allocation Policy 14: Land off Cross Road, Deal (DEA008).
- Site Allocation Policy 15: Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002).
- Site Allocation Policy 16: Deal Small Sites (GTM003, TC4S008, TC4S032 and TC4S047).
- 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).
- Site Allocation Policy 27: Land at Dorman Avenue (AYL001).
- Site Allocation Policy 29: Land on the south eastern side of Roman Way, Elvington (YET008).
- Site Allocation Policy 30: Chapel Hill, Eythorne (TC4S039r).
- Site Allocation Policy 32: Land at Buttsole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).



- Site Allocation Policy 35: Land adjacent to Courtlands, Kingsdown (TC4S074).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way, St Margarets at Cliffe (STM003).
- Site Allocation Policy 39: Land to the west of Townsend Farm Road St Margarets at Cliffe (STM007 and STM008).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).
- Site Allocation Policy 43: Land at Short Lane, Alkham (ALK003).
- Site Allocation Policy 44: Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006r).
- Site Allocation Policy 45: Capel Small Sites (CAP009, CAP011 and CAP013).
- Site Allocation Policy 46: Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003).
- Site Allocation Policy 47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003r).
- Site Allocation Policy 48: Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston (PRE003, PRE016 and PRE017).
- Site Allocation Policy 49: Worth Small Sites (WOR006 and WOR009).
- Site Allocation Policy 50: Land adjacent to Short Street, Chillenden (GOO006).
- Site Allocation Policy 51: Land opposite the Conifers, Coldred (SHE013).
- Site Allocation Policy 52: Prima Windows, Easole Street/Sandwich Road, Nonington (NON006r).
- Site Allocation Policy 53: Ringwould Small Sites (RIN002 and RIN004).
- Site Allocation Policy 54: Land at Durlock Road, Staple (STA004).
- Site Allocation Policy 55: Woodnesborough Small Sites (WOO005 and WOO006).

#### Non-strategic employment allocation policies

- Site Allocation Policy 31: Statenborough Farm (TC4S076).

#### Non-strategic mixed-use allocation policies

- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).

#### Reasonable alternatives SA

**7.52** Before the definition of the preferred publication policies, consideration was given to a range of policy options.

**7.53** The options considered at the Draft Local Plan stage and their reasonableness are reported in **Chapter 6**.

**7.54** Several new site options were identified during the preparation of the Publication Local Plan and were appraised in **Chapter 5**. Variations in the likely significant effects of the reasonable options are reported using the SA framework. The Council's justification for the selection of the preferred options is included below.

#### Housing site allocations<sup>46</sup>

**7.55** All reasonable housing site options considered for allocation in the Publication Local Plan are appraised in **Chapter 5**.

#### Council's reasons for selecting the preferred option

**7.56** Justification for the selection of site allocations is included in **Appendix D**. In summary, site selection is informed by the findings of the District's Housing and Employment Land Availability Assessment (HELAA), the Sustainability Appraisal of the

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<sup>46</sup> It is recognised that some housing site allocations may include some commercial, business, service and community uses associated with the creation of new or densification of existing residential areas. The benefits of such mixed use development in predominantly housing site allocations is acknowledged to have some employment benefits in the SA; however, such mixed use developments have not been appraised separately as employment sites. The employment site assessment criteria in Appendix C have been used to appraise Employment allocations in the Local Plan.

reasonable site options and further evidence, such as the highways modelling and engagement with ward members and town and parish Councillors. Sites have been selected in accordance with the Council's preferred option for the distribution of housing growth, as well as the suitability, availability and achievability of individual site options.

### Gypsy and traveller site options

**7.57** No new gypsy and traveller sites have been allocated in the Publication Local Plan in favour of meeting future needs through existing gypsy and traveller site intensification. The reasonable gypsy and traveller site options considered for allocation in the Publication Local Plan are appraised in **Chapter 5**.

### Employment allocations

**7.58** All reasonable employment site options considered for allocation in the Publication Local Plan are appraised in **Chapter 5**.

### Council's reasons for selecting the preferred option

**7.59** Justification for the selection of site allocations is included in **Appendix D**. In summary, site selection is informed by the findings of the District's Housing and Employment Land Availability Assessment (HELAA), the Sustainability Appraisal of the reasonable site options and further evidence, such as the highways modelling and engagement with ward members and town and parish Councillors. In light of the above, the sites allocated in the Publication Local Plan have been selected in accordance with the Council's preferred option for the distribution of growth (as set out above), as well as the suitability, availability and achievability of individual site options.

### Dover allocation policies SA

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.60** Site Allocation Policy 1 (WHI001r and WHI008) has the potential to generate a **significant positive** effect against this SA objective, for the significant number of homes it will deliver and/or its focus on the delivery of a specific type of needed home.

**7.61** Minor positive effects are expected for the following policies against this objective, for the number of new homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 8: Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022Br).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.62** The remaining site allocation policies are likely to generate negligible effects against this objective because they are allocated for employment development and will therefore not contribute towards housing provision.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.63** The site allocation policies likely to generate **significant positive** effects against this SA objective are:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.64** This is because the housing allocations plan on delivering new local services and facilities at the centre of the new communities they create, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network via the Fastrack with Dover which has planning permission. In the case of Site Allocation Policy 1 (WHI001r and WHI008), the **significant positive** effect is coupled with a minor negative effect. This is because the allocation is located between two strategic roads known to generate significant amounts of noise. New homes in close proximity to this noisy infrastructure has the potential to have an adverse effect on the health and well-being of new residents. However, the adopted Whitfield Masterplan which is in the process of being updated aims to limit the density of homes within the immediate vicinity of the roads and plant trees along the road edges to screen and soften the noise impacts. The **significant positive** effect for Site Allocation Policy 12 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030) is also coupled with a minor negative effect, because a broad range of locations are covered by the allocations listed in the policy, including sites in relatively accessible locations and sites in relatively remote and inaccessible locations.

**7.65 Significant negative** effects are expected for the following policies against this objective:

- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).

**7.66** This is in acknowledgement of the fact the sites allocated under both policies are exposed to noise pollution from roads, with one site, 18 – Dover Waterfront\_r, also falling within an AQMA. Although Site Allocation Policy 3 (18 – Dover Waterfront\_r and DOV017r) seeks to avoid introducing new receptors along the façade of the A20, the proposed development is still likely to result in adverse effects on air quality due to the increase in the number of people in the area with cars. The **significant negative** effects recorded for Site Allocation Policy 3 (18 – Dover Waterfront\_r and DOV017r) and Site Allocation Policy 10 (DOV023) are mixed with minor positive effects because despite the presence of environs that have the potential to adversely affect health and well-being, both these policies allocate sites that are in relatively accessible locations. Further to this, Site Allocation Policy 3 supports the provision of new, and improvements to, pedestrian routes and cycle connections, improving connectivity with the Town Centre and wider area.

**7.67** Site Allocation Policies 6 (21 MidTown\_r – DOV018 and DOV018r), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) and 8 (DOV022Br) are likely to generate a mixed **significant positive** and **significant negative** effect because the sites are in accessible locations and therefore have easy access to local services and facilities, but are located within close proximity to a road/railway line known to generate significant amounts of noise, with potential for adverse effects on health and well-being.

**7.68** The remaining site allocation policies are expected to have minor positive effects in relation to this SA objective because they are in accessible locations and not within close proximity to environs that have potential to adversely affect health and well-being.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.69 Significant positive** effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street Dover (DOV017r2 res (residential) and DOV017r2 emp (employment)).

**7.70** This is in acknowledgement of the fact these policies promote large-scale employment or mixed-use development and will therefore generate a number of employment opportunities within different employment sectors.

**7.71** All remaining site allocation policies are likely to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District.

**7.72** Site Allocation Policy 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and Site Allocation Policy 5 (TC4S092) have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies help to protect and enhance the local character and distinctiveness of the District, maintaining it as a nice place to live, work and visit. The two policies also encourage the

optimisation of opportunities on the site to enhance the economic well-being of the town, such as attracting visitors into the local area, as well as securing jobs maintaining assets and through tourism. However, delivering these local requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

#### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.73** The following site allocation policies are likely to generate **significant positive** effects against this SA objective:

- Strategic Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r Western Heights emp (employment)).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.74** This is in acknowledgement of the fact that most of these site allocations are located within close proximity to a good range of existing local services and facilities, in addition to sustainable transport options. Site Allocation Policy 2 (7 – White Cliffs Business Park\_r3) will contribute to the delivery of new and improved infrastructure and local services and facilities, all of which will contribute to minimising the need to travel by private car. Indeed, the policy specifically requires proposals to maximise the use of public transport and not prejudice the delivery of the Dover Fastrack, in addition to bringing in traffic measures that facilitate access to public transport, pedestrians and cyclists. The **significant positive** effects for Site Allocation Policy 1 (WHI001r and WHI008) and Site Allocation Policy 13 ((DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030) are coupled with minor negative effects for the reasons outlined below.

**7.75** Site Allocation Policy 1 (WHI001r and WHI008) is located farther away from existing local services and facilities and sustainable transport options, meaning that significant numbers of new residents are likely to have to travel farther afield for services and facilities not provided on site, and most likely by private car. However, the policy specifically promotes on and off-site sustainable transport measures, including new and improved pedestrian links and cycle paths and public transport provision, in addition to financial contributions to increase the frequency of Dover Fastrack. Further to this, the policy requires the travel plan for the site to achieve a modal shift of 10-20%. With regard to Site Allocation Policy 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), although most of the sites allocated by this policy are within close proximity of amenities, others are not.

**7.76** The remaining site allocation policies are expected to have minor positive effects against this objective, in acknowledgement of the fact they are located within close proximity to services and facilities, and sustainable transport options, but not as close to these amenities as the sites listed above.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.77** **Significant negative** effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 5: Fort Burgoyne (TC4S092).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.78** This is in acknowledgement of the fact the delivery of such a significant number of homes and employment development will result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. The allocations' development through the Plan period

will result in the loss of these valuable and irreplaceable natural resources. Furthermore, a number of the housing allocations sit within Source Protection Zones.

**7.79** Minor negative effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).

**7.80** This is in acknowledgement of the fact all but one of these site allocations fall within an area safeguarded for minerals extraction. The other site, DOV022E, falls within Source Protection Zones 2 or 3.

**7.81** The remaining site allocation policies will not result in a loss of irreplaceable natural resources and therefore receive a negligible effect against this objective.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.82** The Council's Air Quality Study identifies the preferred site allocations that have the potential to adversely affect the District's air quality on notably sensitive transport corridors and junctions. Allocated sites with the potential to have a slight or moderate adverse effect on NO<sub>2</sub> and/or PM<sub>10</sub> levels in sensitive areas are previously allocated site WHI008 covered under Site Allocation Policy 1 and sites DOV017r, DOV017r2 res/emp, DOV018r, DOV023 in Site Allocation Policies 3, 7, 6 and 10, respectively. Therefore, these policies have the potential to generate a minor negative effect against this SA objective. The minor negative effect for Strategic Policy 4 and Site Allocation Policy 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) is coupled with a minor positive effect because the policy encourages public transport use, including the Dover Fastrack, in addition to walking and cycling.

**7.83** Minor positive effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).

**7.84** Site Allocation Policy 2 (7 – White Cliffs Business Park\_r3) maximises public transport use, in addition to walking and cycling, whilst Site Allocation Policies 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) encourage improvements of the connectivity between the site and the town centre, in addition to Dover Priory railway and Dover waterfront for Site Allocation Policy 4, contributing to a reduction in the number of private vehicles in the town.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.85** A **significant negative** effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).

**7.86** This is in acknowledgement of the fact both sites are identified as being at risk of surface water flooding. The policies require a Flood Risk Assessment to be undertaken but no specific mitigation measures are identified.

**7.87** A minor negative effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).
- Site Allocation Policy 5: Fort Burgoyne (TC4S092).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV027r2 emp (employment)).

- Site Allocation Policy 8: Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022Br).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.88** This is in acknowledgement of the fact these sites are at risk of flooding. The application of the Sequential Approach via a site-specific flood risk assessment to the layout of Site Allocation Policy 1 (WHI001r and WHI008), Site Allocation Policy 3 (18 – Dover Waterfront\_r (employment) and DOV017r (residential)), Site Allocation Policy 5 (TC4S092), Site Allocation Policy 6 (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)), Site Allocation Policy 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)), Site Allocation Policy 10 (DOV023), Site Allocation Policy 12 (DOV028) and Site Allocation Policy 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), in addition to the provision of SUDS, is considered to help mitigate the adverse effects associated with flood risk.

**7.89** Site Allocation Policy 8 (DOV022Br) and Site Allocation Policy 9 (DOV022E) are also at risk from flooding and although the policies require a Flood Risk Assessment to be undertaken, no specific mitigation measures are yet identified. No specific mitigation measures are identified for Site Allocation Policy 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).

**7.90** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA.

**7.91** The following sites were also subject to the Exceptions Test by Dover District Council and found to be the most sustainable of those made available through the HELAA, with their development considered to provide wider sustainability benefits to the community (such as multifunctional SuDS) that would outweigh the identified flood risk: Site Allocation Policies 3 (18 – Dover Waterfront\_r/DOV017r<sup>47</sup>), 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)<sup>48</sup>), 6 (21 MidTown\_r – DOV018/DOV018r<sup>49</sup>) and 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)).

**7.92** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**7.93** The following site allocation policies are likely to generate **significant positive** effects against this SA objective:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.94** This is due to the fact most of these sites have relatively good access to existing public transport services. Site Allocation Policy 2 (7 – White Cliffs Business Park\_r3) will contribute to the delivery of new and improved infrastructure and local services and facilities, all of which will contribute to minimising the need to travel by private car. Indeed, the policy specifically requires proposals to maximise the use of public transport and not prejudice the delivery of the Dover Fastrack, in addition to bringing in traffic measures that restrict access to public transport, pedestrians and cyclists – all of which have the potential to help reduce greenhouse gas emissions associated with the private car.

**7.95** Site Allocation Policy 1 (WHI001r and WHI008) has the potential to generate minor positive effects against this SA objective. Despite being in a location with relatively poor sustainable transport links, the size of the allocation set out in Site

<sup>47</sup> DOV017 in the SFRA.

<sup>48</sup> TC4S083 in the SFRA.

<sup>49</sup> DOV018 in the SFRA.

Allocation Policy 1 offers the opportunity to invest in significant energy efficiency, renewable and low carbon energy measures. Indeed, the policy seeks to achieve net zero carbon living over the lifetime of the development. The adopted Whitfield Masterplan contains plans for a central energy centre for the allocation's decentralised energy network. Furthermore, measures are being put in place to improve sustainable transport links between the allocation and Dover to the south.

**7.96** With regard to Site Allocation Policy 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), although most of the sites allocated by this policy are within close proximity of amenities, others are not. Overall, therefore, the **significant positive** effects for Site Allocation Policy 1 and Site Allocation Policy 13 are coupled with minor negative effects.

**7.97** The remaining site allocation policies are expected to have minor positive effects against this objective because they are in sustainable locations with a range of sustainable travel options.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.98** Precautionary **significant negative** effects are recorded for the following site allocation policies:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.99** This is in acknowledgement of the fact these sites are located within close proximity of European Sites and/or Sites of Special Scientific Interest and therefore fall within their Impact Risk Zones, in addition to being located within close proximity of designated wildlife sites, ancient woodland and/or habitats. Although the site allocation policies make reference to biodiversity habitat creation and enhancement, there is still potential to have adverse effects on habitats directly or indirectly in close proximity, from a range of sources through for example recreational disturbance or poorer air quality. Species and habitat surveys, including wintering bird surveys, would be undertaken prior to determination, to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects. The **significant negative** effects recorded for Site Allocation Policy 1 (WHI001r and WHI008), Site Allocation Policy 2 (7 – White Cliffs Business Park\_r3) and Site Allocation Policy 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) are mixed with minor positive effects. This is due to Site Allocation Policy 1 specifically requiring the protection and enhancement of the areas of ancient woodland near the site and a 15 metre buffer zone around the woodlands that comprises semi-natural habitat, planted with native species so as to contribute to the wider ecological networks. Site Allocation Policy 2 makes provision for a number of landscaped buffer zones, which will incorporate biodiversity enhancements and connect nearby local wildlife sites. Indeed, in the HRA it is concluded that although the sites allocated under Site Allocation Policies 1 and 2 could have high and moderate potential to support Golden Plover, respectively, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Site Allocation Policy 7 requires enhancements to the biodiversity value of the River Dour corridor.

**7.100** Precautionary minor negative effects are recorded for the following site allocation policies:

- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)).
- Site Allocation Policy 8: Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022Br).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).

**7.101** This is due to the fact these site allocation policies are also located within close proximity of European Sites and/or Sites of Special Scientific Interest and therefore fall within their Impact Risk Zones, in addition to being located within close proximity of designated wildlife sites, ancient woodland and/or habitats. However, they may not be as close in proximity to these biodiversity assets as the sites listed previously. The site allocation policies make reference to biodiversity improvements and the provision of landscape buffers that provide opportunities for biodiversity habitat creation and enhancement, but an

increasing number of residents at these sites has the potential to increase recreational pressure on biodiversity assets. The minor negative effects recorded for Site Allocation Policy 6 (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)), Site Allocation Policy 10 (DOV023) and Site Allocation Policy 12 (DOV028) are mixed with minor positive effects because all three policies require enhancements to the biodiversity value of the River Dour corridor.

**7.102** Site Allocation Policy 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) is expected to have a mixed minor positive and minor negative effect in relation to this objective because despite intersecting some Sites of Special Scientific Interest and therefore falling within their Impact Risk Zones, in addition to being located within close proximity to some ecological habitats, the policy is likely to help protect the natural environment by protecting the setting, significance and resilience of the historic environment.

**7.103** Site Allocation Policy 5 (TC4S092) is likely to generate a minor positive effect in relation to this objective because it encourages the protection and enhancement of the natural environment through the protection of the setting, significance and resilience of the District's historic environment.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.104** Site Allocation Policy 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and Site Allocation Policy 5 (TC4S092) are likely to generate **significant positive** effects against this SA objective because both policies are focussed on the conservation, interpretation, promotion and enhancement of the District's historic environments and assets.

**7.105** The following site allocation policies are recorded as having the potential to generate minor positive effects against this SA objective because they require the protection and enhancement of the historic assets within and in the immediate vicinity of their allocation boundaries:

- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).

**7.106** However, the minor positive effects for Site Allocation Policy 1 (WHI001r and WHI008), Site Allocation Policy 6 (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)), Site Allocation Policy 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) and Site Allocation Policy 10 (DOV023) are coupled with minor negative effects because although the policies generally make reference to the protection and enhancement of historic assets, there is still potential to affect the significance of known and unknown historic assets directly or indirectly.

**7.107** The following site allocation policies are recorded as having the potential to generate minor negative effects against this SA objective:

- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park\_r3).
- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030).

**7.108** This is in acknowledgement of the fact that these site allocations are located in close proximity to known historic assets or within historic landscapes or townscapes. Although the allocations generally make reference to the need for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly. The remaining site allocation policies have no notable historic environment sensitivities and therefore record a negligible effect.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.109** Site Allocation Policy 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and Site Allocation Policy 5 (TC4S092) are likely to generate **significant positive** effects against this SA objective because both policies



promote the conservation and enhancement of historic environments and the restoration of the District's heritage assets, which will directly help protect and enhance the District's landscapes and townscapes.

**7.110** Site Allocation Policy 1 (WHI001r and WHI008), Site Allocation Policy 3 (18 – Dover Waterfront\_r (employment) and DOV017r (residential)) and Site Allocation Policy 6 (21 MidTown\_r – DOV018 (employment) and DOV018r Mid Town (residential)) are recorded as having the potential to generate minor positive effects against this SA objective. Site Allocation Policy 1 promotes a landscape led approach to the layout and form of development and the establishment of distinctive character areas, in addition to retaining and enhancing the green infrastructure network. Site Allocation Policy 3 and Site Allocation Policy 6 seek to enhance the quality of the environment through the provision of public art to create a sense of place and identity, as well as improvements to the public realm. Further to this, both policies require consideration to be given to the character and context of the area, to ensure that development relates well to its surroundings.

**7.111** Site Allocation Policy 2 (7 – White Cliffs Business Park\_r3) is likely to have mixed minor positive and minor negative effects in relation to this SA objective because although the policy requires a minimum of 20% on-plot landscaping, the site has moderate or low-moderate landscape sensitivity and could therefore still affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly. The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.3: Likely effects of Publication Local Plan Dover site allocation policies

Dover Site Allocation Policies / SA Objectives	Site Allocation Policy 1: Whitfield Urban Expansion (WH1001r and WH1008)	Site Allocation Policy 2: 7 – White Cliffs Business Park_r3	Site Allocation Policy 3: 18 – Dover Waterfront_r (employment) and DOV017r (residential)	Site Allocation Policy 4: 23r – Western Heights res (residential) and 23r – Western Heights emp (employment)	Site Allocation Policy 5: TC4S092	Site Allocation Policy 6: 21 MidTown_r – DOV018 (employment) and DOV018r (residential)	Site Allocation Policy 7: DOV017r2 res (residential) and DOV017r2 emp (employment)	Site Allocation Policy 8: DOV022Br	Site Allocation Policy 9: DOV022E	Site Allocation Policy 10: DOV023	Site Allocation Policy 11: DOV026r	Site Allocation Policy 12: DOV028	Site Allocation Policy 13: DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030	
SA1: Housing	++	0	+	0	0	+	+	+	+	+	+	+	+	
SA2: Health and well-being	++/-	+	--/+	+	+	++/--	++/--	++/--	+	--/+	+	++/--	++/-	
SA3: Employment	+	++	++	+/-	+/-	++	++	+	+	+	+	+	+	
SA4: Transport	++/-	++	+	++	+	++	++	+	+	+	+	++	++/-	
SA5: Resources	--	--	-	0	--	-	-	0	-	-	--	-	--	
SA6: Air pollution	+/-	0	-	+	0	-	+	0	0	-	0	0	0	
SA7: Flood risk	-	--	-	0	-	-	-	-	-	-	--	-	-	
SA8: Climate change	++/-	++	+	++	+	++	++	+	+	+	+	++	++/-	
SA9: Biodiversity	--/+	--/+	--	+	+	+/-	--/+	-	-	+/-	-	+/-	--	
SA10: Historic environment	+/-	-	-	++	++	+/-	+/-	0	0	+/-	0	-	-	
SA11: Landscape	+	+/-	+	++	++	+	0	0	0	0	0	0	0	
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+	+ Minor positive effect likely		+/- or ++/- Mixed minor or significant effect likely	-	- Minor negative effect likely		--/+	-- Significant negative effect likely		0 Negligible effect likely

## Deal allocation policies SA

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.112** The Deal non-strategic site allocation policies have the potential to generate minor positive effects against this SA objective due to the number of new homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- Site Allocation Policy 14: Land off Cross Road, Deal (DEA008).
- Site Allocation Policy 15: Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002).
- Site Allocation Policy 16: Deal Small Sites (GTM003, TC4S008, TC4S032 and TC4S047).

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.113** Minor negative effects are recorded for two of the non-strategic site allocation policies (Site Allocation Policy 14 (DEA008) and Site Allocation Policy 15 (WAL002)) because although they are within close proximity to some services, mainly schools, they are not within close proximity of a town centre.

**7.114** Site Allocation Policy 16 (GTM003, TC4S008, TC4S032 and TC4S047) is likely to generate mixed minor positive and minor negative effects because a broad range of locations are covered by the allocations listed in the policy, including sites in relatively accessible locations and sites in relatively remote and inaccessible locations.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.115** All non-strategic housing allocation policies are likely to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.116** Site Allocation Policy 14 (DEA008) and Site Allocation Policy 16 (GTM003, TC4S008, TC4S032 and TC4S047) are likely to generate mixed minor positive and minor negative effects. Most of the sites allocated under both policies are not located within close proximity of a good range of existing local services and facilities, in addition to sustainable transport options, meaning that new residents are likely to have to travel farther afield for services and facilities and most likely by car. However, Site Allocation Policy 16 also promotes the development of a site that is within close proximity to these amenities, whilst Site Allocation Policy 14 supports the creation of a direct pedestrian route to Walmer Railway Station and more general pedestrian improvements. The policy also promotes traffic management improvements to Cross Road and while this would potentially promote car use, the improvements would also help to reduce congestion.

**7.117** A minor negative effect is recorded for Site Allocation Policy 15 (WAL002) against this objective because the site has relatively poor access to existing local services and facilities, including sustainable transport options.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**7.118 Significant negative** effects are recorded for Site Allocation Policy 14 (DEA008) and Site Allocation Policy 16 (GTM003, TC4S008, TC4S032 and TC4S047). This is because both policies would result in the loss of greenfield land, including agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land, including Grades 1 and 2 land. Additionally, Site Allocation Policy 14 supports development on land that falls within Source Protection Zone 1, whilst one of the site allocations under Site Allocation Policy 16 sits within an area safeguarded for future mineral extraction. The allocations' that sit on some of the best and most versatile agricultural land, in addition to mineral safeguarding areas, will result in the loss of these valuable and irreplaceable natural resources.

**7.119** Site Allocation Policy 15 (WAL002) is likely to have a minor negative effect against this objective because over 25% of the site is classified as Grade 3 agricultural land.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.120** In isolation, all site allocation policies are likely to generate negligible effects on air quality in the District.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.121** A minor negative effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 15: Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002).
- Site Allocation Policy 16: Deal Small Sites (GTM003, TC4S008, TC4S032 and TC4S047).

**7.122** Site WAL002 allocated under Site Allocation Policy 15 is at risk of surface water flooding, whilst a large proportion of sites TC4S032 and TC4S047 allocated under Site Allocation Policy 16 fall within Flood Zone 3. The application of the Sequential Approach via a site-specific flood risk assessment to the layout of these sites by locating the most vulnerable elements in the lowest risk areas, in addition to the provision of SUDS at some sites, is considered to help mitigate these adverse effects to minor negative effects.

**7.123** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA.

**7.124** Sites TC4S032 and TC4S047 allocated under Site Allocation Policy 16 were also subject to the Exceptions Test by Dover District Council and found to be the most suitable of those made available through the HELAA, with their development considered to provide wider sustainability benefits to the community (such as multifunctional SuDS) that would outweigh the identified flood risk.

**7.125** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.126** Site Allocation Policy 14 (DEA008) and Site Allocation Policy 16 (GTM003, TC4S008, TC4S032 and TC4S047) are likely to generate mixed minor positive and minor negative effects. Most of the sites allocated under both policies are not located within close proximity to services and facilities, in addition to sustainable transport options, meaning that new residents are likely to have to travel further afield and most likely by car. However, Site Allocation Policy 16 also promotes the development of a site that is within close proximity to these amenities, whilst Site Allocation Policy 14 supports the creation of a direct pedestrian route to Walmer Railway Station and improvements to pedestrian crossings and footways, all of which are likely to promote walking, which is a more sustainable transport mode. The policy promotes traffic management improvements to Cross Road and while this would potentially promote car use, the improvements would also help to reduce congestion and associated emissions.

**7.127** A minor negative effect is recorded for Site Allocation Policy 15 (WAL002) against this objective because the site has poor access to existing local services and facilities, in addition to sustainable transport options and will therefore not help in reducing greenhouse gas emissions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.128** A precautionary minor negative effect is recorded for Site Allocation Policies 14 (DEA008), 15 (WAL002) and 16 (GTM003, TC4S008, TC4S032 and TC4S047). This acknowledges the fact that the sites allocated under these policies are located within close proximity to European Sites and/or Sites of Special Scientific Interest and fall within their Impact Risk Zones defined by Natural England. According to the HRA, although the sites allocated under Site Allocation Policies 14 (DEA008) and 15 (WAL002) could have high and moderate potential to support Golden Plover, respectively, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although the allocations, in addition to Site Allocation Policy 16 (GTM003, TC4S008, TC4S032 and TC4S047), generally make reference to the provision of landscape buffers that provide opportunities for biodiversity habitat creation and enhancement, an increasing number of residents at these sites has the potential to increase recreational pressure on designated sites. Species and habitats surveys, including wintering bird surveys, would be undertaken to avoid ecological impacts in accordance with the mitigation hierarchy and to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.129** The following site allocation policies are recorded as having the potential to generate minor negative effects against this SA objective:

- Site Allocation Policy 14: Land off Cross Road, Deal (DEA008).
- Site Allocation Policy 15: Land at Rays Bottom between Liverpool Road and Hawkdown, Walmer (WAL002).
- Site Allocation Policy 16: Deal Small Sites (GTM003, TC4S008, TC4S032 and TC4S047).

**7.130** This is in acknowledgement of the fact that the site allocations could result in a minor degree of effect on assets of medium or high significance, as a consequence of setting change and/or where assets of low significance may experience physical or setting change. Although the allocations generally make reference to the need for development to be sensitively designed to respect the existing historic character of an area and for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.131** Site Allocation Policy 15 (WAL002) is expected to have a minor negative effect on this objective because the site has moderate or low-moderate landscape sensitivity and although the allocation policy requires development to be low density and sensitively designed to allow transition to the rural landscape, in addition to referencing the need for appropriate landscaping and screening measures, there is still potential for the development to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly. The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.4: Likely effects of Publication Local Plan Deal site allocation policies

Deal Site Allocation Policies / SA Objectives	Site Allocation Policy 14: DEA008	Site Allocation Policy 15: WAL002	Site Allocation Policy 16: GTM003, TC4S008, TC4S032 and TC4S047		
SA1: Housing	+	+	+		
SA2: Health and well-being	-	-	+/-		
SA3: Employment	+	+	+		
SA4: Transport	+/-	-	+/-		
SA5: Resources	--	-	--		
SA6: Air pollution	0	0	0		
SA7: Flood risk	0	-	-		
SA8: Climate change	+/-	-	+/-		
SA9: Biodiversity	-	-	-		
SA10: Historic environment	-	-	-		
SA11: Landscape	0	-	0		
<b>Key</b>	+	+/-	-	--	0
	Minor positive effect likely	Mixed minor effect likely	Minor negative effect likely	Significant negative effect likely	Negligible effect likely

## Sandwich allocation policies SA

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.132** The Sandwich non-strategic site allocation policies have the potential to generate minor positive effects against this SA objective, for the number of new homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- 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).

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

A **significant positive** effect is expected for Site Allocation Policy 21 (SAN013), as the site will contain some safeguarded land for expansion of the Sandwich Technology School, therefore promoting access to education.

A minor positive effect is recorded for the following site allocation policies against this SA objective:

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

**7.133** This is in acknowledgement that these allocations are in accessible locations and therefore have easy access to local facilities and services.

**7.134** Site Allocation Policy 23 (SAN019r) is likely to have a minor negative effect against this SA objective due to it being located within a relatively inaccessible location and exposed to noise pollution from roads.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.135** All non-strategic site allocation policies are likely to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.136** A minor positive effect is also recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 17: Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich (SAN004).
- Strategic Site Allocation Policy 18: Sandwich Highway Depot/Chippie's Way, Ash Road, Sandwich (SAN006).
- Strategic Site Allocation Policy 19: Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007).
- Strategic Site Allocation Policy 20: Woods' Yard, rear of 17 Woodnesborough Road, Sandwich (SAN008).
- Strategic Site Allocation Policy 21: Land adjacent to Sandwich Technology School, Deal Road, Sandwich (SAN013).
- Strategic Site Allocation Policy 22: Land at Archers Low Farm, St Georges Road, Sandwich (SAN023).

**7.137** This is in acknowledgement of the fact these allocations are located within close proximity of a good range of existing local services and facilities, in addition to sustainable transport options.

**7.138** Site Allocation Policy 23 (SAN019r) is likely to have a minor negative effect against this SA objective because the site has poor access to existing local services and facilities, in addition to sustainable transport options.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.139 Significant negative** effects are recorded for Site Allocation Policy 17 (SAN004), Site Allocation Policy 19 (SAN007), Site Allocation Policy 21 (SAN013), Site Allocation Policy 22 (SAN023) and Site Allocation Policy 23 (SAN019r). This is because a significant proportion of site SAN004 allocated under Site Allocation Policy 17 comprises Grade 3 agricultural land and also falls within a Minerals Safeguarding Area. The remaining site allocations will also result in the loss of greenfield land, specifically agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. The allocations' development through the Plan period will therefore result in the loss of these valuable and irreplaceable natural resources.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.140** In isolation, the site allocation policies are likely to generate negligible effects on air quality in the District.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.141** A minor negative effect is recorded for the following site allocation policies against this SA objective:

- 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: Wood's 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).

**7.142** This is in acknowledgement of the fact that the sites allocated under Site Allocation Policies 17, 18 and 20 fall within Flood Zone 3 and the remaining sites allocated under Site Allocation Policy 19, Site Allocation Policy 21 and Site Allocation Policy 22 contains land with a 1 in 30 year risk of surface water flooding. The application of the Sequential Approach via a site-specific flood risk assessment to the layout of these sites by locating the most vulnerable elements in the lowest risk areas, in addition to the provision of SUDS at SAN023, is considered to help mitigate the adverse effects associated with flood risk.

**7.143** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA.

**7.144** The following sites were also subject to the Exceptions Test by Dover District Council and found to be the most sustainable of those made available through the HELAA, with their development considered to provide wider sustainability benefits to the community (such as multifunctional SuDS) that would outweigh the identified flood risk: Site Allocation Policies 17 (SAN004), 18 (SAN006), 19 (SAN007) and 20 (SAN008).

**7.145** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.146** A minor positive effect is recorded for the following site allocation policies against this SA objective:

- 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: Wood's 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).



**7.147** This in acknowledgement that many of these allocations are in sustainable locations with a range of sustainable travel options. However, the allocations' relatively smaller size offer less scope to take advantage of economies of scale to develop homes that deliver improvements in energy efficiency and other renewable and low carbon energy technologies that deliver carbon reductions significantly over and above national building regulation requirements.

**7.148** Site Allocation Policy 23 (SAN019r) is likely to have a minor negative effect against this SA objective. This in acknowledgement that the site is located in a relatively remote location, far from sustainably accessible local services and facilities and job opportunities, resulting in greater need to travel by private vehicles – one of the primary sources of greenhouse gas emissions in the District.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.149** A precautionary uncertain **significant negative** effect is recorded for Site Allocation Policy 18 (SAN006). This is because site SAN006 is located within close proximity to European Sites and/or Sites of Special Scientific Interest and therefore falls within their Impact Risk Zones, in addition to being located within close proximity of a locally designated wildlife site and/or ancient woodland. Although the site allocation policy makes reference to biodiversity habitat creation and enhancement, there is still potential for adverse effects on habitats directly or indirectly in close proximity, from a range of sources through for example recreation disturbance or poorer air quality. Species and habitats surveys would be undertaken to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects.

**7.150** Precautionary minor negative effects are recorded for the following site allocation 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 19: Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007).
- Site Allocation Policy 20: Wood's 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).

**7.151** This acknowledges the fact that the sites allocated under these policies are located within close proximity to European Sites and/or Sites of Special Scientific Interest and fall within their Impact Risk Zones defined by Natural England. According to the HRA, although the site allocated by Site Allocation Policy 22 (SAN023) could have moderate potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although the allocations generally make reference to the provision of landscape buffers that provide opportunities for biodiversity habitat creation and enhancement, an increasing number of residents at these sites has the potential to increase recreational pressure on designated sites. Species and habitats surveys, including wintering bird surveys, would be undertaken to avoid ecological impacts in accordance with the mitigation hierarchy and to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.152** The following site allocation policies are recorded has having the potential to generate minor adverse effects against this SA objective:

- 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).

**7.153** This is in acknowledgement of the fact that many of the site allocations could result in a minor degree of effect on assets of medium or high significance, as a consequence of setting change and/or where assets of low significance may experience physical or setting change. Although the allocations generally make reference to the need for heritage assessments to inform measures to preserve and enhance or avoid harm to any heritage assets or archaeology, there is still potential to affect the significance of known and unknown heritage assets directly or indirectly.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.154** The following site allocation policies are recorded as having the potential to generate minor adverse effects against this SA objective:

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

**7.155** This is in acknowledgement of the fact that these site allocations are located in close proximity to known sensitive landscapes or townscapes. Although the allocations generally make reference to the need for development to be sensitively designed, in addition to referencing the need for appropriate landscaping and screening measures, there is still potential to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly. The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.5: Likely effects of Publication Local Plan Sandwich site allocation policies

Sandwich Site Allocation Policies / SA Objectives	Site Allocation Policy 17: SAN004	Site Allocation Policy 18: SAN006	Site Allocation Policy 19: SAN007	Site Allocation Policy 20: SAN008	Site Allocation Policy 21: SAN013	Site Allocation Policy 22: SAN023	Site Allocation Policy 23: SAN019r
SA1: Housing	+	+	+	+	+	+	+
SA2: Health and well-being	+	+	+	+	+	+	-
SA3: Employment	+	+	+	+	+	+	+
SA4: Transport	+	+	+	+	+	+	-
SA5: Resources	--	0	--	0	--	--	--
SA6: Air pollution	0	0	0	0	0	0	0
SA7: Flood risk	-	-	-	-	-	-	0
SA8: Climate change	+	+	+	+	+	+	-
SA9: Biodiversity	-	--	-	-	-	-	-
SA10: Historic environment	-	-	-	-	-	-	-
SA11: Landscape	0	-	-	-	0	-	0
<b>Key</b>	+ Minor positive effect likely		- Minor negative effect likely		-- Significant negative effect likely		0 Negligible effect likely

## Aylesham allocation policies SA

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.156** Site Allocation Policy 24 (AYL003r2) has the potential to generate a **significant positive** effect against this SA objective, for the significant number of homes it will deliver and/or its focus on the delivery of a specific type of needed home. Site Allocation Policy 27 (ALY001) is expected to have a minor positive effect on this objective due to the number of new homes it will deliver and/or its focus on the delivery of a specific type of needed home. The remaining site allocation policies are likely to generate negligible effects against this objective because they are allocated for employment development and will therefore not contribute towards housing provision.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.157** Site Allocation Policy 26 (14 – Land off Holt Street) is located within close proximity of a ‘mine entry’ recorded by the Coal Authority, offering scope for health and safety risks which require further investigation. Therefore, Site Allocation Policy 25 is expected to have a **significant negative** effect on this objective.

**7.158** Site Allocation Policy 24 (ALY003r) is likely to generate a **significant positive** effect against this SA objective because it plans on delivering new local services and facilities at the centre of the new community it creates, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network.

**7.159** Site Allocation Policy 25 (4 – Aylesham Development Area) is likely to have a minor positive effect against this SA objective due to it being located in a relatively accessible location with good access to local services and facilities. Site Allocation Policy 26 (AYL001) is likely to generate a negligible effect against this objective because it had good access to some facilities and not others and is not within close proximity of any environs affecting health and well-being.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.160** The strategic site allocation policies, Site Allocation Policy 25 (4 – Aylesham Development Area) and Site Allocation Policy 26 (14 – Land off Holt Street), are specifically allocated for employment development and due to their size, will help in the delivery of a significant number of new employment opportunities. Therefore, they are recorded as having **significant positive** effects in relation to this SA objective.

**7.161** All remaining site allocation policies are likely to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.162** Site Allocation Policy 24 (AYL003r2) and Site Allocation Policy 25 (4 – Aylesham Development Area) are considered likely to generate **significant positive** effects against this SA objective. This is because Site Allocation Policy 24 plans to deliver new local services and facilities at the centre of the new community it creates, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network. Furthermore, the location already has relatively good access to existing local rail and bus services. Site Allocation Policy 25 has very good access to existing sustainable transport modes and the policy makes provision for pedestrian and cycle links that connect to existing routes to Aylesham Railway Station, which would also help reduce congestion.

**7.163** Site Allocation Policy 27 (AYL001) is likely to have a minor positive effect against this objective because it is located within close proximity of a good range of existing local services and facilities, in addition to sustainable transport links.

**7.164** Site Allocation Policy 26 (14 – Land off Holt Street) is recorded as having a mixed minor positive and minor negative effect against this SA objective because although the site has good access to local services and facilities, the policy supports improvements to the Holt Street/Aylesham Road Junction. Whilst this could help reduce congestion, it may also promote car use.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.165 Significant negative** effects are recorded for Site Allocation Policy 23 (AYL003r2) in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land.

**Significant negative** effects are also recorded for the following non-strategic site allocation policies:

- Site Allocation Policy 25: Aylesham Development Area (4 – Aylesham Development Area).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).
- Site Allocation Policy 27: Land at Dorman Avenue (AYL001).

**7.166** This is in acknowledgement of the fact all three sites fall within Source Protection Zones 2 or 3 and whilst a significant proportion of Site Allocation Policy 25 (4 – Aylesham Development Area) includes Grade 1 or 2 agricultural land, a significant proportion of Site Allocation Policy 26 (14 – Land off Holt Street) and Site Allocation Policy 27 (AYL001) include Grade 3 agricultural land and/or a small proportion of Grade 1 or 2 agricultural land. The allocations' development through the Plan period could therefore result in the loss of best and most versatile agricultural land.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.167** Site Allocation Policy 24 (AYL003r2) is likely to have a minor positive effect against this objective as it makes provision for new local services and facilities, including a shop that meets the day-to-day convenience shopping needs of new residents, as well as investing in the local sustainable transport network – all of which are likely to reduce reliance on the private car and associated air pollution. In isolation, the remaining site allocation policies are likely to generate negligible effects on air quality in the District.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.168** A minor adverse effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 24: South Aylesham (AYL003r2).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).

**7.169** This is in acknowledgement of the fact that the delivery of such a significant number of homes under Site Allocation Policy 24 (AYL003r2) will result in the loss of large areas of greenfield land and vegetation performing an important cooling and water sequestration role. The loss of this land to development will generally increase the likelihood of surface water flooding and extreme heat in the developed parts of the District. The application of the Sequential Approach via a site-specific flood risk assessment to the layout of the site by locating the most vulnerable elements in the lowest risk areas, in addition to the provision of sustainable drainage at the site, is considered to help mitigate the adverse effects associated with flood risk.

**7.170** With regard to Site Allocation Policy 26 (14 – Land off Holt Street), the site is at risk from surface water flooding and although the policy requires a site-specific Flood Risk Assessment to address the issue of surface water flooding, there is still potential for development to have an adverse effect on flood risk as a result of climate change, over the lifetime of the development. The remaining site allocation policies have no notable climate change vulnerabilities and therefore record a negligible effect.

**7.171** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA. None of the sites allocated by the Aylesham allocation policies were subject to the Exceptions Test.

**7.172** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.173** Site Allocation Policy 24 (AYL003r2) and Site Allocation Policy 25 (4 – Aylesham Development Area) have the potential to generate **significant positive** effects against this SA objective. This is due to the fact that they have relatively good access to existing public transport services and Site Allocation Policy 24 includes plans to significantly improve the range of local services and facilities, helping to reduce the need for the new communities they create to travel by private vehicles.

**7.174** Site Allocation Policy 27 (AYL001) and Site Allocation Policy 26 (14 – Land off Holt Street) are likely to have minor positive effects against this objective because they are in sustainable locations with a range of sustainable travel options. However, Site Allocation Policy 26 is also expected to have a minor negative effect against this objective because the policy supports improvements to the Holt Street/Aylesham Road Junction and although this would help reduce congestion and associated greenhouse gas emissions, it may also promote car use.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.175** Precautionary **significant negative** effects are recorded for the following site allocation policies:

- Site Allocation Policy 24: South Aylesham (AYL003r2).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).

**7.176** This is in acknowledgement of the fact Site Allocation Policy 24 (AYL003r2) intersects with a designated biodiversity site and a priority habitat, in addition to being located within close proximity of European Sites and/or Sites of Special Scientific Interest and therefore falls within their Impact Risk Zones defined by Natural England. The site allocated under Site Allocation Policy 24 is also noted in the HRA as having high potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands. However, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. The effect against Site Allocation Policy 24 (AYL003r2) is mixed with a minor positive effect because the policy sets out requirements for notable enhancement to ecological assets and networks within and in the immediate vicinity of development.

**7.177** Site Allocation Policy 26 (14 – Land off Holt Street) intersects with a county/local geological site and like Site Allocation Policy 24, also intersects an Impact Risk Zone, in addition to falling within close proximity of a designated biodiversity site and priority habitat. Although Site Allocation Policy 26 makes reference to biodiversity habitat creation and enhancement, there is still potential to adversely affect habitats directly or indirectly in close proximity, from a range of sources through for example recreation disturbance or poorer air quality. Species and habitats surveys would be undertaken to avoid ecological impacts in accordance with the mitigation hierarchy and to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects.

**7.178** Site Allocation Policy 25 (4 – Aylesham Development Area) is expected to have a precautionary minor negative effect against this SA objective because it falls within close proximity of European Sites and/or Sites of Special Scientific Interest and falls within their Impact Risk Zones. According to the HRA, although the site allocated by Site Allocation Policy 25 could have moderate potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although the policy makes reference to the provision of landscape buffers that provide opportunities for biodiversity habitat creation and enhancement, there is still potential to affect habitats directly or indirectly in close proximity through, for example, recreational disturbance. The policy does, however, require species and habitat surveys to be undertaken prior to determination, to inform layout and design, avoiding ecological impacts in accordance with the mitigation hierarchy, in addition to compensation and enhancement measures. Site Allocation Policy 27 (AYL001) has no notable natural environment sensitivities and therefore records a negligible effect.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.179** The following site allocation policies are recorded as having the potential to generate minor adverse effects against this SA objective:

- Site Allocation Policy 24: South Aylesham (AYL001r).
- Site Allocation Policy 25: Aylesham Development Area (4 – Aylesham Development Area).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).
- Site Allocation Policy 27: Land at Dorman Avenue (AYL001).

**7.180** This is in acknowledgement of the fact that many of the site allocations could result in a minor degree of effect on assets of medium or high significance, as a consequence of setting change and/or where assets of low significance may experience

physical or setting change. Although the allocations generally make reference to the need for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.181** The following site allocation policies are recorded as having the potential to generate minor adverse effects against this SA objective:

- Site Allocation Policy 24: South Aylesham (AYL003r2).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).

**7.182** This is in acknowledgement of the fact that these site allocations are located in close proximity to known sensitive landscapes or townscapes. Although the allocations generally make reference to the need for appropriate landscaping and screening measures, particularly for views to and from the AONB, the wide extent of development and significant loss of openness in certain parts of the District's countryside means there is still potential to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly. The effect for Site Allocation Policy 24 (AYL003) is mixed with a minor positive effect against this SA objective because the policy requires the protection and enhancement of the landscapes that surround the site and to mitigate any impact on the AONB, including sensitive landscaping and planting. The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.6: Likely effects of Publication Local Plan Aylesham site allocation policies

Aylesham Site Allocation Policies / SA Objectives	Site Allocation Policy 24: AYL003r2	Site Allocation Policy 25: 4 – Aylesham Development Area	Site Allocation Policy 26: 14 – Land off Holt Street	Site Allocation Policy 27: AYL001			
SA1: Housing	++	0	0	+			
SA2: Health and well-being	++	+	--	0			
SA3: Employment	+	++	++	+			
SA4: Transport	++	++	+/-	+			
SA5: Resources	--	--	--	--			
SA6: Air pollution	+	0	0	0			
SA7: Flood risk	-	0	-	0			
SA8: Climate change	++	++	+/-	+			
SA9: Biodiversity	--/+?	-	--	0			
SA10: Historic environment	-	-	-	-			
SA11: Landscape	+/-	0	-	0			
<b>Key</b>	++ Significant positive effect likely	+ Minor positive effect likely	+/- Mixed minor effect likely	- Minor negative effect likely	--/+ Mixed significant negative and minor positive effect likely	-- Significant negative effect likely	0 Negligible effect likely



## Local centre allocation policies SA

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.183** Site Allocation Policy 27 (EYT003, EYT009 and EYT012) has the potential to generate a **significant positive** effect against this SA objective, for the significant number of homes it will deliver and/or its focus on the delivery of a specific type of needed home.

**7.184** The following site allocation policies are likely to have minor positive effects against this SA objective due to the number of new homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- Site Allocation Policy 29: Land on the south eastern side of Roman Way, Elvington (EYT008).
- Site Allocation Policy 30: Chapel Hill, Eythorne (TC4S039r)
- Site Allocation Policy 32: Land at Buttssole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).
- Site Allocation Policy 35: Land adjacent to Courtlands, Kingsdown (TC4S074).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way, St Margarets at Cliffe (STM003).
- Site Allocation Policy 39: Land to the west of Townsend Farm Road St Margarets at Cliffe (STM007 and STM008).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).

**7.185** Site Allocation Policy 31 (TC4S076) is recorded as having a negligible effect against this objective because it proposes employment development rather than residential development and will therefore not contribute to housing numbers.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.186 Significant negative** effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 31: Statenborough Farm (TC4S076).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).

**7.187** This is in acknowledgement of the fact Site Allocation Policies 31 (TC4S076) and 41 (WIN014) are located in relatively close proximity to local sewage treatment works, resulting in the potential need to implement measures to reduce the adverse effects of the odours emanating from the works.

**7.188** Site Allocation Policy 28 (EYT003, EYT009 and EYT012) is likely to have a **significant positive** effect against this objective. This is because the strategic housing allocation plans on delivering new local services and facilities at the centre of the new community it creates, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network. However, the significant positive effect is coupled with a minor negative effect. This is because the allocation is located farther away from a good range of existing local services and facilities and sustainable transport options in the District, meaning the significant numbers of new residents concentrated in this location are likely to have to travel farther afield for services and facilities not provided on site.

**7.189** All but one of the remaining site allocation policies are likely to generate minor negative effects against this objective because they are located in relatively inaccessible locations. Site Allocation Policy 29 (EYT008) is likely to have a negligible effect because while it is within close proximity to some services, it is not to others. It is noted that Site Allocation Policy 29 promotes enhancements to open space and community facilities within the vicinity of the site.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.190** All site allocation policies are likely to generate minor positive effects against this SA objective in acknowledgement of the construction jobs generated by each development site and the capacity of each site allocation to accommodate new employees in the District. Site Allocation Policy 31 (TC4S076) is specifically allocated for employment development and will therefore help in the delivery of employment opportunities.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.191** Site Allocation Policy 28 (EYT003, EYT009 and EYT012) is considered likely to generate a **significant positive** effect against this SA objective. This is because it plans to deliver new local services and facilities at the centre of the new community it creates, as well as investing in improving the capacity and sustainability of existing local services and facilities, including the local sustainable transport network. Furthermore, the location already has relatively good access to existing local rail and bus services. However, the significant positive effect is mixed with a minor negative effect because while the policy seeks to improve the capacity of the local sustainable transport network, making improvements to the road network may encourage use of the private car, despite helping to reduce congestion.

**7.192** Site Allocation Policies 36 (SHE004r2 and TC4S082) and 37 (SHE006 and SHE008) are likely to have minor positive effects against this objective because the sites allocated under these policies are located within close proximity of a range of services and facilities, in addition to sustainable transport options. Conversely, all but one of the remaining site allocation policies are likely to generate minor negative effects against this objective because they have poor access to existing services and facilities, in addition to sustainable transport options. Site Allocation Policy 29 (EYT008) is likely to have a negligible effect because while it is within close proximity to some services and sustainable transport options, it is not to others.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**7.193 Significant negative** effects are recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 28: Land between Eythorne and Elvington (EYT003, EYT009 and EYT012).
- Site Allocation Policy 31: Statenborough Farm (TC4S076).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way, St Margarets at Cliffe (STM003).
- Site Allocation Policy 39: Land to the west of Townsend Farm Road St Margarets at Cliffe (STM007 and STM008).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).

**7.194** This is in acknowledgement of the fact that Site Allocation Policy 28 (EYT003, EYT009 and EYT012) will deliver a significant number of new homes and result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. The non-strategic site allocation policies listed above will also result in the loss of best and most versatile agricultural land. Furthermore, a large proportion of the sites are located within areas safeguarded for future mineral extraction. Therefore, the allocations' development through the Plan period will result in the loss of these valuable and irreplaceable natural resources. Two of the sites, STM003 and STM006, also fall within a Source Protection Zone.

**7.195** Site Allocation Policies 29 (EYT008), 30 (TC4S039r), 32 (EAS002) and 36 (SHE004r2 and TC4S082) are likely to generate minor negative effects against this SA objective because development of these sites will result in a loss of agricultural land. Site Allocation Policies 34 (KIN002) and 35 (TC4S074) are likely to have negligible effects as their development will not result in a loss of irreplaceable natural resources.

#### SA 6: To reduce air pollution and ensure air quality continues to improve

**7.196** Site Allocation Policy 28 (EYT003, EYT009 and EYT012) is likely to generate a minor positive effect against this SA objective as it makes provision for new local services and facilities, including a shop that meets the day-to-day convenience shopping needs of new residents, as well as investing in the local sustainable transport network – all of which are likely to reduce reliance on the private car and associated air pollution. In isolation, the remaining site allocation policies are likely to generate negligible effects on air quality in the District.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**7.197** A minor negative effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 28: Land between Eythorne and Elvington (EYT003, EYT009 and EYT012).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).

**7.198** This is in acknowledgement of the fact that Site Allocation Policy 28 (EYT003, EYT009 and EYT012) will deliver a significant number of homes, resulting in the loss of large areas of greenfield land and vegetation performing an important cooling and water sequestration role. The loss of this land to development will generally increase the likelihood of surface water flooding and extreme heat in the developed parts of the District. The other site allocation policies contain some sites that are located on land with the potential for surface water flooding, the risk of which is likely to increase with their development. The application of the Sequential Approach via a site-specific flood risk assessment to the layout of the sites by locating the most vulnerable elements in the lower risk areas, in addition to the incorporation of sustainable drainage systems within such developments, is considered to help mitigate the adverse effects associated with flood risk.

**7.199** Site Allocation Policies 32 (EAS002) and 42 (WIN003 and WIN004) are expected to have negligible effects in relation to this objective because although most of the sites allocated under these policies are at risk of surface water flooding, the application of the Sequential Approach to the layout of the sites by locating the most vulnerable elements in the lower risk areas, is considered to mitigate these effects. The remaining site allocation policies have no notable climate change vulnerabilities and therefore record a negligible effect.

**7.200** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA. None of the sites allocated by the Local centre allocation policies were subject to the Exceptions Test.

**7.201** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**7.202** Site Allocation Policy 28 (EYT003, EYT009 and EYT012) has the potential to generate a **significant positive** effect against this SA objective. This is due to the fact it has relatively good access to existing public transport services and includes plans to significantly improve the range of local services and facilities, helping to reduce the need for the new community it creates to travel by private vehicle. However, the significant positive effect is mixed with a minor negative effect because while the policy seeks to improve the capacity of the local sustainable transport network, making improvements to the road network may encourage use of the private car and associated greenhouse gas emissions, despite helping to improve traffic flow.

**7.203** Site Allocation Policies 36 (SHE004r2 and TC4S082) and 37 (SHE006 and SHE008) are likely to have minor positive effects against this objective because the sites are located within sustainable locations with a range of sustainable travel options. Conversely, most of the remaining site allocation policies are likely to generate minor negative effects against this objective because they are located in relatively remote locations, far from sustainably accessible local services and facilities and job opportunities, resulting in greater need to travel by private vehicles – one of the primary sources of greenhouse gas emissions in the District. Site Allocation Policy 29 (EYT008) is likely to have a negligible effect because while it is within close proximity to some services and sustainable transport options, it is not to others.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**7.204** A precautionary **significant negative** effect is recorded for Site Allocation Policies 28 (EYT003, EYT009 and EYT012) and 31 (TC4S076) because the sites are located within close proximity to European Sites and/or Sites of Special Scientific Interest and therefore fall within their Impact Risk Zones, in addition to being located within close proximity of designated wildlife

sites, ancient woodland and/or habitats, or intersecting them. According to the HRA, although the sites allocated by Site Allocation Policies 28 and 31 could have high potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although both site allocation policies make reference to a wintering bird survey, which would be undertaken to inform ecological mitigation measures, such measures may not avoid all adverse effects. Site Allocation Policy 28 (EYT003, EYT009 and EYT012) sets out requirements for notable enhancement to ecological assets and green infrastructure within and in the immediate vicinity of development, resulting in the potential for minor positive effects against this SA objective. Therefore, this policy also records a minor positive effect against this SA objective, resulting in a mixed minor positive and minor negative effect overall.

**7.205** Precautionary minor negative effects are recorded for the following site allocation policies:

- Site Allocation Policy 30: Chapel Hill, Eythorne (TC4S039r).
- Site Allocation Policy 32: Land at Buttssole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).
- Site Allocation Policy 35: Land adjacent to Courtlands, Kingsdown (TC4S074).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way, St Margarets at Cliffe (STM003).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).

**7.206** This is in acknowledgement of the fact these sites are located within close proximity to European Sites and/or Sites of Special Scientific Interest and therefore fall within their Impact Risk Zones, in addition to being located within close proximity of designated wildlife sites, ancient woodland and/or habitats. According to the HRA, most of the sites allocated by Site Allocation Policies 32 (EAS002), 34 (KIN002), 37 (SHE006 and SHE008) and 41 (WIN0014) could have moderate potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although the site allocation policies make reference to biodiversity habitat creation and enhancement, there is still potential to have adverse effects on habitats directly or indirectly in close proximity, from a range of sources through for example recreational disturbance or poorer air quality. Species and habitat surveys would be undertaken to inform ecological mitigation, compensation and enhancement measures, but such measures may not avoid all adverse effects. The remaining site allocation policies have no notable ecological vulnerabilities and therefore record a negligible effect.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.207** A **significant negative** effect is recorded for Site Allocation Policy 39 (STM007 and STM008) because the site allocation could result in a significant degree of effect on assets of medium or high significance, via setting change or physical change. Although the policy requires a heritage assessment to inform measures to avoid harm to any heritage assets identified through the assessment, there is still potential for development to affect the significance of known and unknown historic assets directly or indirectly.

**7.208** The following site allocation policies are recorded as having the potential to generate minor negative effects against this SA objective:

- Site Allocation Policy 28: Land between Eythorne and Elvington (EYT003, EYT009 and EYT012).
- Site Allocation Policy 29: Land on the south eastern side of Roman Way, Elvington (EYT008).
- Site Allocation Policy 32: Land at Buttssole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).

- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).

**7.209** This is in acknowledgement of the fact that many of the site allocations could result in a minor degree of effect on assets of medium or high significance, as a consequence of setting change and/or where assets of low significance may experience physical or setting change. Although the allocations generally make reference to the need for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly. The remaining site allocation policies have no notable historic environment sensitivities and therefore record a negligible effect.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.210** The following site allocation policies are recorded as having the potential to generate minor negative effects against this SA objective:

- Site Allocation Policy 30: Chapel Hill, Eythorne (TC4S039r).
- Site Allocation Policy 32: Land at Buttssole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).
- Site Allocation Policy 35: Land adjacent to Courtlands, Kingsdown (TC4S027).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).

**7.211** This is in acknowledgement of the fact that the site allocations above are located in close proximity to known sensitive landscapes or townscape. Although the allocations generally make reference to the need for an appropriate landscape buffer, there is still potential for development to affect the significance of the District's landscapes, townscape and seascapes directly or indirectly. The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.7: Likely effects of Publication Local Plan local centre site allocation policies

Local Centre Site Allocation Policies / SA Objectives	Site Allocation Policy 28: EYT003, EYT009 and EYT012	Site Allocation Policy 29: EYT008	Site Allocation Policy 30: TC4S039r	Site Allocation Policy 31: TC4S076	Site Allocation Policy 32: EAS002	Site Allocation Policy 33: EAS009 and TC4S023	Site Allocation Policy 34: KIN002	Site Allocation Policy 35: TC4S074	Site Allocation Policy 36: SHE004r2 and TC4S082	Site Allocation Policy 37: SHE006 and SHE008	Site Allocation Policy 38: STM003	Site Allocation Policy 39: STM007 and STM008	Site Allocation Policy 40: STM006 and STM010	Site Allocation Policy 41 : WIN0014	Site Allocation Policy 42 : WIN003 and WIN004
SA1: Housing	++	+	+	0	+	+	+	+	+	+	+	+	+	+	+
SA2: Health and well-being	++/-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
SA3: Employment	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
SA4: Transport	++/-	0	-	-	-	-	-	-	+	+	-	-	-	-	-
SA5: Resources	--	-	-	-	-	-	0	0	-	-	-	-	-	-	-
SA6: Air pollution	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SA7: Flood risk	-	0	0	0	0	-	0	0	0	-	0	0	0	0	0
SA8: Climate change	++/-	0	-	-	-	-	-	-	+	+	-	-	-	-	-
SA9: Biodiversity	--/+	0	-	-	-	-	-	-	-	-	-	0	-	-	-
SA10: Historic environment	-	-	0	0	-	-	-	0	-	-	0	-	-	0	-
SA11: Landscape	0	0	-	0	-	-	-	-	-	0	0	0	-	-	0
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+	+/- Mixed minor effect likely		- Minor negative effect likely			-/+ Mixed significant negative and minor positive effect likely		-- Significant negative effect likely		0 Negligible effect likely	

## Larger village allocation policies SA

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.212** All site allocation policies have the potential to generate minor positive effects against this SA objective, for the number of homes they will deliver and/or their focus on the delivery of a specific type of needed home:

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.213** Site Allocation Policy 47 (LYD003r) is expected to have a minor positive effect against this SA objective due to it being located in a relatively accessible location with good access to local services and facilities. It is noted that provision of play facilities has been identified as a local need, but the policy does not make provision for these facilities, stating that provision should be determined in liaison with the Parish Council and District Council. The remaining site allocation policies are likely to generate minor negative effects against this SA objective, in acknowledgement of the fact these allocations are located within relatively remote and inaccessible locations.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.214** All site allocation policies are likely to generate mixed minor positive and minor negative effects against this SA objective in acknowledgement of the fact that although construction jobs will be generated by each development site, the sites are located in relatively remote locations at villages farther from sustainably accessible job opportunities.

### SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.215** Site Allocation Policy 47 (LYD003r) is expected to generate a minor positive effect against this SA objective because the site is located within close proximity of a range of existing local services and facilities, and sustainable transport options. The remaining site allocation policies are expected to have minor negative effects in relation to this objective, in acknowledgement of the fact these site allocations have poor access to local services and facilities, in addition to sustainable transport options.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**7.216** All site allocation policies are expected to have **significant negative** effects against this SA objective in acknowledgement of the fact the delivery of new homes at many of these sites will result in the loss of greenfield land, including agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land, with one site, ALK003, also falling within a Minerals Safeguarding Area. The allocations' development through the Plan period will result in the loss of these valuable and irreplaceable natural resources. A lot of these sites also fall within Source Protection Zones 2 or 3.

### SA 6: To reduce air pollution and ensure air quality continues to improve

**7.217** The Council's Air Quality Study identifies the preferred site allocations that have the potential to adversely affect the District's air quality on notably sensitive transport corridors and junctions. LYD003r allocated under Site Allocation Policy 47 has the potential to have a slight or moderate adverse effect on levels of NO<sub>2</sub> and/or PM<sub>10</sub>. However, the policy requires development to include appropriate air quality mitigation measures as set out in the Air Quality Assessment. Despite this, the site is located in a relatively remote location and is therefore likely to increase reliance on the private car despite its proximity to more sustainable transport modes, with an overall minor negative effect recorded. The remaining site allocation policies are also expected to have minor negative effects against this SA objective because like LYD003r, they are located in relatively remote locations at villages where good accessibility to a wide range of local services, facilities and jobs are less readily available, encouraging private car travel.

### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**7.218** A **significant negative** effect is recorded for Site Allocation Policy 48 (PRE003, PRE016 and PRE017) against this SA objective because PRE017 is identified as being at risk of surface water flooding. Although the policy states that a site-specific Flood Risk Assessment is required to address the issue of surface water flooding, mitigation measures are not set out within the policy.

**7.219** A minor negative effect is recorded for the following site allocation policies against this SA objective:

- Site Allocation Policy 43: Land at Short Lane, Alkham (ALK003).
- Site Allocation Policy 47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003r).
- Site Allocation Policy 49: Worth Small Sites (WOR006 and WOR009)

**7.220** This is in acknowledgement of the fact that most of the sites allocated by these policies fall within Flood Zones 2 and 3 and/or are at risk of surface water flooding. The acknowledged application of the Sequential Approach to the layout of these sites by locating the most vulnerable elements in the lowest risk areas via a site-specific flood risk assessment, in addition to the provision of SUDS at ALK003 and WOR006, is considered to help mitigate the adverse effects associated with flood risk. Site Allocation Policy 45 (CAP009, CAP011 and CAP013) is also expected to have a minor negative effect against this objective but this is because CAP011 is at risk of surface water flooding but specific mitigation is not contained within the policy. The remaining site allocation policies have no notable climate change vulnerabilities and therefore record a negligible effect.

**7.221** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA. None of the sites allocated by the Larger village allocation policies were subject to the Exceptions Test.

**7.222** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**7.223** Site Allocation Policy 47 (LYD003r) is expected to generate a minor positive effect against this SA objective because it is within close proximity of a range of sustainable travel options. However, the allocation's relatively small sizes offers less scope to take advantage of economies of scale to develop homes that deliver improvements in energy efficiency and other renewable and low carbon energy technologies that deliver carbon reductions significantly over and above national building regulation requirements.

**7.224** The remaining site allocation policies are likely to generate minor negative effects against this SA objective in acknowledgement of the fact they are located in relatively remote locations, far from sustainably accessible local services and facilities and job opportunities, resulting in greater need to travel by private vehicle – one of the primary sources of greenhouse gas emissions in the District.

### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**7.225** A precautionary **significant negative** effect is recorded for Site Allocation Policy 48 (PRE003, PRE016 and PRE017) because although the HRA identifies the sites allocated under this policy as having high potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effects on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site. Although Site Allocation Policy 48 makes reference to a wintering bird survey, which would be undertaken to inform ecological mitigation measures, such measures may not avoid all adverse effects. The HRA identified the sites as having potential to support hen harrier, northern shoveler and ruff. However, given this is the only site allocation to support these qualifying bird species, the HRA states that the impacts of the proposed development are considered unlikely to adversely affect the integrity of the Stodmarsh SPA and Ramsar site.

**7.226** Precautionary minor negative effects are recorded for the following site allocation policies:

- Site Allocation Policy 44: Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006r).
- Site Allocation Policy 45: Capel Small Sites (CAP009, CAP011 and CAP013).
- Site Allocation Policy 46: Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003).
- Site Allocation Policy 47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003r).
- Site Allocation Policy 49: Worth Small Sites (WOR006 and WOR009).



**7.227** This acknowledges the fact that the sites allocated under these policies are located within close proximity to European Sites and/or Sites of Special Scientific Interest and fall within their Impact Risk Zones defined by Natural England, in addition to being located within close proximity of a locally designated wildlife site and/or ancient woodland. According to the HRA, although the sites allocated under Site Allocation Policies 44 (CAP006r), 46 (LAN003) and 47 (LYD003r) could have moderate potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar site, in addition to the Stodmarsh SPA and Ramsar site for CAP006r (Site Allocation Policy 38). Although the site allocation policies make reference to biodiversity habitat creation and enhancement, an increasing number of residents at these sites has the potential to increase recreational pressure on designated sites. Species and habitats surveys, including wintering bird surveys, would be undertaken to inform ecological mitigation and enhancement measures, but such measures may not avoid all adverse effects. The remaining site allocation policy, 43 (ALK003), has no notable ecological vulnerabilities and therefore records a negligible effect against this SA objective.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.228** The following site allocation policies are recorded as having the potential to generate minor negative effects against this SA objective:

- Site Allocation Policy 44: Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006r).
- Site Allocation Policy 45: Capel Small Sites (CAP009, CAP011 and CAP013).
- Site Allocation Policy 46: Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003).
- Site Allocation Policy 47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003r).
- Site Allocation Policy 49: Worth Small Sites (WOR006 and WOR009).

**7.229** This is in acknowledgement of the fact that many of the site allocations could result in a minor degree of effect on assets of medium or high significance, as a consequence of setting change and/or where assets of low significance may experience physical or setting change. Although the allocations generally make reference to the need for heritage assessments to inform measures to avoid and mitigate adverse impacts, there is still potential to affect the significance of known and unknown historic assets directly or indirectly. It is noted that Site Allocation Policy 47 (LYD003r) requires development to be sensitive to the setting of the adjacent farmstead as a group of historic buildings. The remaining site allocation policies have no notable historic environment sensitivities and therefore record a negligible effect.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.230** Site Allocation Policy 45 (CAP009, CAP011 and CAP013) is recorded as having the potential to generate a minor negative effect against this SA objective because CAP011 is located within close proximity to known sensitive landscapes. Although the allocation generally makes reference to the need for an appropriate landscape buffer, particularly because the site falls within the AONB, there is still potential for development to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly.

**7.231** Site Allocation Policy 46 (LAN003) requires development to be sensitively designed to respect the character of the area and to allow transition to the rural landscape, in addition to focussing higher density development in the southern part of the site, instead of the northern and north western part of the site which is to be retained as a landscape buffer. Therefore, a minor positive effect is expected against this objective.

**7.232** The remaining sites and policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.8: Likely effects of Publication Local Plan larger village site allocation policies

Larger Village Site Allocation Policies / SA Objectives	Site Allocation Policy 43: ALK003	Site Allocation Policy 44: CAP006r	Site Allocation Policy 45: CAP009, CAP011 and CAP013	Site Allocation Policy 46: LAN003	Site Allocation Policy 47: LYD003r	Site Allocation Policy 48: PRE003, PRE016 and PRE017	Site Allocation Policy 49: WOR006 and WOR009
SA1: Housing	+	+	+	+	+	+	+
SA2: Health and well-being	-	-	-	-	+	-	-
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	-	-	-	-	+	-	-
SA5: Resources	--	--	--	--	--	--	--
SA6: Air pollution	-	-	-	-	-	-	-
SA7: Flood risk	-	0	-	0	-	--	-
SA8: Climate change	-	-	-	-	+	-	-
SA9: Biodiversity	0	-	-	-	-	--	-
SA10: Historic environment	0	-	-	-	-	0	-
SA11: Landscape	0	0	-	+	0	0	0
<b>Key</b>	+ Minor positive effect likely		+/- Mixed minor effect likely		- Minor negative effect likely	-- Significant negative effect likely	0 Negligible effect likely

### Smaller village and hamlet allocation policies SA

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.233** All site allocation policies are likely to have minor positive effects against this SA objective, for the number of homes they will deliver and/or their focus on the delivery of a specific type of needed home.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.234** Site Allocation Policy 53 (RIN002 and RIN004) is likely to have a **significant negative** effect against this SA objective because the two sites allocated under this policy, RIN002 and RIN004, are exposed to significant levels of noise pollution from the A258 (Dover Road). Although the policy requires a noise survey to be undertaken, such measures may not avoid all adverse effects.

**7.235** Minor negative effects are recorded for the remaining site allocation policies, in acknowledgement of the fact these allocations are located within relatively remote and inaccessible locations and therefore residents do not have easy access to local services and facilities.

#### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.236** All site allocation policies are likely to generate mixed minor positive and minor negative effects against this SA objective in acknowledgement of the fact that although construction jobs will be generated by each development site, the sites are located in relatively remote locations at villages farther from sustainably accessible job opportunities.

#### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.237** All site allocation policies are likely to generate minor negative effects against this SA objective because the sites have poor access to local services and facilities, in addition to sustainable transport options.

#### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**7.238** All but one of the site allocation policies are likely to have **significant negative** effects against this SA objective in acknowledgement of the fact the delivery of new homes at these sites will result in the loss of greenfield land, including agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. Site Allocation Policy 54 (STA004) also falls within a Minerals Safeguarding Area. The allocations' development through the Plan period will therefore result in the loss of these valuable and irreplaceable natural resources. Additionally, a lot of these sites also fall within a Source Protection Zone.

**7.239** Site Allocation Policy 51 (SHE013) is likely to have a minor negative effect in relation to this objective because it comprises best and most versatile agricultural land but does not fall within a Source Protection Zone or Minerals Safeguarding Area.

#### SA 6: To reduce air pollution and ensure air quality continues to improve

**7.240** Although the site allocations are not identified in the Council's Air Quality Study as likely to contribute towards air pollution, the fact they are located in relatively remote locations at villages where good accessibility to a wide range of local services, facilities and jobs are less readily available, they have the potential to encourage private car travel. Therefore, both site allocation policies are likely to have a minor negative effect against this SA objective.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**7.241** A **significant negative** effect is recorded for Site Allocation Policy 50 (GOO006) against this SA objective because GOO006 is at severe risk of surface water flooding. Site Allocation Policy 50 states that a site-specific Flood Risk Assessment is required to address the issue of surface water flooding but does not specify what mitigation measures will be undertaken to

reduce flood risk. The remaining site allocation policies have no notable climate change vulnerabilities and therefore record negligible effects.

**7.242** Dover District Council has applied the Sequential Test to all proposed site allocations, based on the findings of the Level 2 SFRA. None of the sites allocated by the Smaller village and hamlet allocation policies were subject to the Exceptions Test.

**7.243** The Council's Sequential and Exceptions Tests Assessment can be found in **Appendix E**.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.244** All site allocation policies are likely to generate minor negative effects against this SA objective in acknowledgement of the fact they are located in relatively remote locations, far from sustainably accessible local services and facilities and job opportunities, resulting in greater need to travel by private vehicle – one of the primary sources of greenhouse gas emissions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.245** Site Allocation Policy 55 (WOO005 and WOO006) is expected to have a precautionary minor negative effect against this SA objective because according to the HRA, one of the sites (WOO006) has moderate potential to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands. However, inclusion and implementation of appropriate safeguards and mitigation in the Local Plan would provide certainty that there would be no adverse effect on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar Site. Although the allocation makes reference to a wintering bird survey, which would be undertaken to inform ecological mitigation measures, such measures may not avoid all adverse effects.

**7.246** The remaining site allocation policies have no notable ecological vulnerabilities and therefore record negligible effects against this SA objective.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.247** Site Allocation Policies 50 (GOO006) and 54 (STA004) are likely to have **significant negative** effects against this SA objective because the two sites allocated under these policies could result in a significance degree of effect on assets of medium or high significance, via setting change or physical change. Although the allocations generally make reference to the need for heritage assessments, there is still potential to affect the significance of known and unknown historic assets directly or indirectly.

**7.248** The remaining site allocation policies are likely to have minor negative effects against this SA objective because their development could result in a minor degree of effect on assets of medium or high significance, and although the policies reference the need for heritage assessments, there is still potential to affect the significance of the historic assets directly or indirectly.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.249** Site Allocation Policy 54 (STA004) is likely to generate a minor negative effect against this SA objective because site STA004 has moderate or low-moderate landscape sensitivity and although the policy requires a landscape buffer, there is still potential for development to affect the significance of the District's landscapes, townscapes and seascapes directly or indirectly. The remaining site allocation policies have no notable landscape, townscape or seascape sensitivities and therefore record a negligible effect.

Table 7.9: Likely effects of Publication Local Plan smaller village and hamlet site allocation policies

Smaller Village and Hamlet Site Allocation Policies / SA Objectives	Site Allocation Policy 50: GOO006	Site Allocation Policy 51: SHE013	Site Allocation Policy 52: NON006r	Site Allocation Policy 53: RIN002 and RIN004	Site Allocation Policy 54: STA004	Site Allocation Policy 55: WOO005 and WOO006
SA1: Housing	+	+	+	+	+	+
SA2: Health and well-being	-	-	-	--	-	-
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	-	-	-	-	-	-
SA5: Resources	--	-	--	--	--	--
SA6: Air pollution	-	-	-	-	-	-
SA7: Flood risk	--	0	0	0	0	0
SA8: Climate change	-	-	-	-	-	-
SA9: Biodiversity	0	0	0	0	0	-
SA10: Historic environment	--	-	-	-	--	-
SA11: Landscape	0	0	0		-	
<b>Key</b>	+ Minor positive effect likely		+/- Mixed minor effect likely	- Minor negative effect likely	-- Significant negative effect likely	0 Negligible effect likely

### Strategic and non-strategic housing and employment allocation policy recommendations

**7.250** The SA finds the allocation policies of the Publication Local Plan to deliver a range of significant and minor positive and negative effects across a range of SA objectives in the SA framework. Their focus on housing and employment issues limits their potential to generate **significant positive** effects against all the SA objectives, although there may be scope to minimise the significance or likelihood of some of the potential adverse effects identified.

**7.251** With regards to the **significant negative** effects identified for SA objective 5 (resources), as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further. Similarly, other potential environmental adverse effects identified against SA objectives 2 (health and well-being), 4 (transport), 7 (flood risk), 8 (climate change), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations. Consequently, these potential adverse effects are only likely to be completely avoided through the selection of alternative site options. The reasons for why the Council have selected the allocated sites over the reasonable alternatives performing equally well or better are set out in **Appendix D**.

**7.252** Some of the **significant negative** and minor negative effects recorded against SA objective 2 (health and well-being) could be avoided or mitigated through additional policy wording requiring measures to avoid or mitigate adverse effects generated by certain sites in close proximity to sources of noise and air pollution or potential health and safety risks, such as site WIN014's close proximity to a sewage treatment works.

**7.253** The minor negative effects recorded against SA objective 6 (air pollution) for Strategic Policy 1 (Whitfield Urban Expansion) and Site Allocation Policies 3 (18 – Dover Waterfront\_r (employment) and DOV017r), 6 (21 MidTown\_r – DOV018 and DOV018r), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)), 10 (DOV023) and 47 (LYD003r), are likely to be minimised once the mitigation measures set out in the Air Quality Study (2021) and Kent and Medway Air Quality Planning Guidance<sup>50</sup> have been implemented. However, the minor negative effects recorded for the larger village and smaller village and hamlet allocations are a product of the location of the selected allocations. Therefore, these potential adverse effects are only likely to be avoided through the selection of alternative site options.

**7.254** The **significant negative** effects recorded against SA objective 7 (flood risk) for Site Allocation Policies 2 (7 – White Cliffs Business Park\_r3), 11 (DOV026r), 48 (PRE003, PRE016 and PRE017), 50 (GOO006), 53 (RIN002, RIN004), 51 (SHE013), 54 (STA004), 55 (WOO005 and WOO006) could be avoided or mitigated further through additional policy wording requiring the most vulnerable elements of development to be in the lowest risk areas and implementation of sustainable drainage systems (SUDS). Where minor negative effects are recorded against this SA objective, similar mitigation measures would be beneficial. The Council considers there to be other policies in other chapters of the Publication Local Plan that help to avoid and mitigate these potential negative effects. **Table 7.18** names the other policies that are likely to help in this regard. The **significant negative** effects recorded against SA objective 9 (biodiversity) could be avoided or mitigated further through consideration of the recommendations set out in the HRA Report accompanying the Publication Local Plan. Additional policy wording could also be included naming sensitive ecological habitats in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by development and new communities in the vicinity, including those sites that receive a minor negative effect against this SA objective.

**7.255** The **significant negative** effects recorded for Site Allocation Policies 39 (STM007 and STM008), 43 (GOO006), 53 (RIN002, RIN004), 51 (SHE013), 54 (STA004), 55 (WOO005 and WOO006) against SA objective 10 (historic environment) could be mitigated through additional policy wording naming sensitive historic assets in close proximity to sites and specific mitigation measures that help avoid adverse effects on the historic environment. Likewise, the minor negative effects against this SA objective could be avoided or mitigated through additional policy wording that also names sensitive historic assets and requires measures to avoid or mitigate potential adverse effects generated by development. The Council considers there to be other policies in other chapters of the Publication Local Plan that help to avoid and mitigate these potential negative effects. **Table 7.18** names the other policies that are likely to help in this regard.

**7.256** The minor negative effects recorded against SA objective 11 (landscape) could be avoided or mitigated further through additional policy wording naming sensitive views and settings in close proximity to sites and requiring measures to avoid or mitigate potential adverse effects generated by development.

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<sup>50</sup> The Kent and Medway Air Quality Planning Guidance is to be adopted as a Supplementary Planning Document (SPD).

**7.257** With regards to the recommendations outlined above for SA objectives 7 (flood risk), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape), the Council considered adding in additional wording requiring developers to design in such mitigation and enhancement measures into all employment development proposals. However, the Council concluded that making this mandatory for all planning applications would unnecessarily prohibit development or undermine the viability of projects, with adverse effects against SA objectives 1 (housing) and 3 (employment). The Council therefore considers that an appropriate balance has therefore been struck between the two. Furthermore, other policies in other chapters of the Publication Local Plan help to avoid and mitigate these potential negative effects. **Table 7.18** names the other policies that are likely to help in this regard.

## Climate Change Policies

**7.258** The Council has drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define nine climate change policies in the Publication Local Plan:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 1: Reducing Carbon Emissions.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 3: Renewable and Low Carbon Energy Development.
- Climate Change Policy 4: Water Efficiency.
- Climate Change Policy 5: Flood Risk.
- Climate Change Policy 6: Surface Water Management.
- Climate Change Policy 7: Coastal Change Management Areas.
- Climate Change Policy 8: Tree Planting and Protection.

## Reasonable alternatives SA

**7.259** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. Further justification can be found in the Publication Local Plan.

## Climate change policies SA

**7.260** **Table 7.10** sets out the likely effects of the Publication Local Plan climate change policies. The reasoning for the identification of these likely effects is set out by SA objective below.

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.261** The climate change policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge the policies' promotion of good place-making that will benefit existing and new residents, as well as the long-term resilience of the local housing market. The policies also promote higher-quality, more sustainable and attractive developments that contribute to and invest in local infrastructure. Delivering all these requirements has the potential to reduce the affordability of new homes and/or their viability over the Plan period, with minor negative effects against this SA objective. The minor mixed effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.262** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 5: Flood Risk.
- Climate Change Policy 6: Surface Water Management.
- Climate Change Policy 7: Coastal Change Management Areas.

**7.263** This is because these policies focus on protecting the local population from the potential significant health risks associated with flooding. Furthermore, Strategic Policy 1 (Planning for Climate Change) encourages sustainable and active travel, which contribute to health lifestyles, help to minimise the number of private vehicles on the road and the air and noise pollution they create.

**7.264** The remaining climate change policies promote investment in technologies and infrastructure that will directly or indirectly improve the health and well-being of local residents, workers and visitors, notably through the cooling and heating of buildings, reductions in energy bills for residents and businesses. Improving the District's green infrastructure network will also contribute to mitigating air pollution, urban cooling and the mental health of the District's population. Therefore, they each receive a minor positive effect. The minor positive effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**7.265** The climate change policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge the policies' promotion of good place-making that will benefit existing and new businesses and workers, as well as the long-term resilience of the local economy. The policies also promote higher-quality, more sustainable and attractive developments that contribute to and invest in local infrastructure. Delivering all these requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective. The minor mixed effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.266** Strategic Policy 1 (Planning for Climate Change) is likely to generate **significant positive** effects against this objective because it encourages sustainable and active travel, which contributes to reducing the need to travel by private vehicle and reduce road congestion. Climate Change Policy 3 (Renewable and Low Carbon Energy Development) is expected to have a minor negative effect against this objective, in acknowledgement of the fact the policy encourages the construction of renewable and low carbon technologies, which has the potential to generate significant levels of construction traffic; however, the policy requires that their development will not result in unacceptable impact on the local transport network that cannot be satisfactorily mitigated, so only a minor negative effect is recorded against this SA objective.

### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.267** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 4: Water Efficiency.
- Climate Change Policy 7: Coastal Change Management Areas.
- Climate Change Policy 8: Tree Planting and Protection.

**7.268** This is because these policies are focussed on the protection of the District's water supply and quality and/or sustainable design and construction practices that minimise resource use and impact on natural resources and protect and expand the District's tree coverage. Minor positive effects are recorded for Climate Change Policy 5 (Flood Risk) and Climate Change Policy 6 (Surface Water Management), both of which also contribute to the protection of the District's natural resources by minimising destructive flooding and the surface water run-off with the potential to pollute local habitats and water supplies.

**7.269** A mixed minor positive and negative effect is recorded for Climate Change Policy 3 (Renewable and Low Carbon Energy Development) in acknowledgement of the fact that largescale installations have the potential to generate minor negative effects through the loss of at least some greenfield land and its natural resources. The minor positive effect recognises that renewable and low carbon energy sources minimise the need to use fossil fuels and can be generated from waste.



#### SA 6: To reduce air pollution and ensure air quality continues to improve

**7.270** The following climate change policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 1: Reducing Carbon Emissions.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 3: Renewable and Low Carbon Energy Development.
- Climate Change Policy 8: Tree Planting and Protection.

**7.271** This is because these policies reduce the need for the District to burn fossil fuels to travel and heat and power businesses and homes, which are the primary sources of air pollution in the District. Climate Change Policy 8 (Tree Planting and Protection) contributes by encouraging the planting of new trees which are known to help reduce and disperse air pollution. The minor positive effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

#### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**7.272** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 4: Water Efficiency.
- Climate Change Policy 5: Flood Risk.
- Climate Change Policy 6: Surface Water Management.
- Climate Change Policy 7: Coastal Change Management Areas.
- Climate Change Policy 8: Tree Planting and Protection.

**7.273** This is because these policies directly promote climate change adaptation through sustainable design and construction practices, the management of local flood risk and the expansion and enhancement of the District's green infrastructure network.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**7.274** The following climate change policies have the potential to generate **significant positive** effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 3: Renewable and Low Carbon Energy Development.
- Climate Change Policy 4: Water Efficiency.
- Climate Change Policy 8: Tree Planting and Protection.

**7.275** This is because these policies directly promote climate change mitigation through the promotion of sustainable design and construction practices, energy efficiency, renewable and low carbon technologies and sustainable and low carbon travel practices.

**7.276** Climate Change Policy 1 (Reducing Carbon Emissions) promotes a reduction in carbon emissions for both residential and non-residential buildings, and is therefore expected to have a minor positive effect in relation to this objective. The effect is recorded as uncertain because the actual effect is partly dependent on the Future Homes Standard coming into effect.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**7.277** Strategic Policy 1 (Planning for Climate Change) and Climate Change Policy 8 (Tree Planting and Protection) both focus on the expansion and enhancement of the District's green infrastructure network, which has the potential to have **significant positive** effects against this SA objective. However, it is noted that Climate Change Policy 8 contains some scope for the loss of trees but only when the benefits of development clearly outweigh their retention and no alternative options exist. With the exception of Climate Change Policy 1 (Reducing Carbon Emission), which is considered to have a negligible effect on this SA objective (at least within the Plan period) and Climate Change Policy 3 (Renewable and Low Carbon Energy Development), the

remaining climate change policies are considered to have a minor positive effect on this SA objective by virtue of the fact that they indirectly promote or protect biodiversity through the promotion of sustainable design and construction practices, sustainable transport (reducing air and noise pollution) and water supply, quality and flood risk management.

**7.278** Climate Change Policy 3 (Renewable and Low Carbon Energy Development) has the potential to have a minor negative effect on this SA objective. Although the policy requires that renewable and low carbon energy proposals do not result in significant harm to habitats, biodiversity or wildlife, such developments have the potential to result in the loss or disturbance of wildlife and habitats. However, the policy also requires proposals to conserve and enhance the natural environment through measures such as through improvements to biodiversity, so a minor positive effect is also recorded.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.279** With the exception of Climate Change Policy 4 (Water Efficiency) and Climate Change Policy 8 (Tree Planting and Protection), all the climate change policies have the potential to generate minor positive effects on this SA objective. This is because the policies promote sustainable design and construction, which is considered to generate indirect minor positive effects against this objective, by improving the climate change resilience of historic assets across the District.

**7.280** With the exception of Climate Change Policy 3 (Renewable and Low Carbon Energy Development) which requires such proposals to have no adverse impact on historic assets, the climate change policies that promote climate change mitigation are likely to result in increased investment in energy efficiency technologies in historic settlements, including on and in close proximity to historic assets which may result in adverse effects to their setting and/or significance. Therefore, the following climate change policies have the potential for mixed minor positive and minor negative effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 1: Reducing Carbon Emissions.
- Climate Change Policy 2: Sustainable Design and Construction.

**7.281** The minor mixed effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.282** Climate Change Policy 8 (Tree Planting and Protection) has the potential to generate a **significant positive** effect against this SA objective by virtue of the fact that it promotes the protection and planting of more trees throughout the District, directly helping to protect and enhance the District's landscapes and townscapes.

**7.283** The remaining climate change policies have the potential to generate minor positive effect against this SA objective through the promotion of sustainable design and construction, flood protection and sustainable water management and the protection and enhancement of green infrastructure in the urban and rural areas. These policies not only safeguard and enhance the District's landscapes and townscapes in the short term but help to ensure they are climate change resilient in the medium to long term.

**7.284** The climate change policies promoting climate change mitigation are likely to result in increased investment in energy efficiency and low carbon and renewable technologies in existing urban areas and in the open countryside, which may result in minor adverse effects to the District's landscapes and townscapes. Therefore, the following climate change policies have the potential for mixed minor positive and minor negative effects against this SA objective:

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 1: Reducing Carbon Emissions.
- Climate Change Policy 2: Sustainable Design and Construction.
- Climate Change Policy 3: Renewable and Low Carbon Energy Development.

**7.285** The minor mixed effect for Climate Change Policy 1 (Reducing Carbon Emissions) is recorded as uncertain because the actual effect of the policy is partly dependent on the Future Homes Standard coming into effect.

Table 7.10: Likely effects of Publication Local Plan climate change policies

Climate Change Policies / SA Objectives	Strategic Policy 1: Planning for Climate Change	Climate Change Policy 1: Reducing Carbon Emissions	Climate Change Policy 2: Sustainable Design and Construction	Climate Change Policy 3: Renewable and Low Carbon Energy Development	Climate Change Policy 4: Water Efficiency	Climate Change Policy 5: Flood Risk	Climate Change Policy 6: Surface Water Management	Climate Change Policy 7: Coastal Change Management Areas	Climate Change Policy 8: Tree Planting and Protection
SA1: Housing	+/-	+?/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and well-being	++	+?	+	+	+	++	++	++	+
SA3: Employment	+/-	+?/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	++	0	0	-	0	0	0	0	0
SA5: Resources	++	0	++	+/-	++	+	+	++	++
SA6: Air pollution	+	+?	+	+	0	0	0	0	+
SA7: Flood risk	++	0	++	0	++	++	++	++	++
SA8: Climate change	++	+?	++	++	++	0	0	0	++
SA9: Biodiversity	++	0	+	+/-	+	+	+	+	++
SA10: Historic environment	+/-	+?/-	+/-	0	0	+	+	+	0
SA11: Landscape	+/-	+?/-	+/-	-	+	+	+	+	++
<b>Key</b>	++ Significant positive effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		- Minor negative effect likely		0 Negligible effect likely

### Climate change policy recommendations

**7.286** No additional recommendations on the Council's climate change policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local plan can be found in **Chapter 6**.

### Placemaking Policies

**7.287** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define seven place making policies in the Publication Local Plan:

- Strategic Policy 2: Planning for Healthy and Inclusive Communities.
- Place Making Policy 1: Achieving High Quality Design, Place Making and the provision of Design Codes.
- Place Making Policy 2: Quality of Residential Accommodation.
- Place Making Policy 3: Providing Open Space.
- Place Making Policy 4: Sports Provision.
- Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.
- Place Making Policy 6: Community Facilities and Services.

### Reasonable alternatives SA

**7.288** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**<sup>51</sup>. Further justification can be found in the Publication Local Plan.

### Planning for healthy and inclusive communities policies SA

**7.289** **Table 7.11** sets out the likely effects of the Publication Local Plan placemaking policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.290** Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) is expected to have a mixed **significant positive** effect in acknowledgement of the policy's promotion of good housing development design, place making and the need to meet local housing requirements in terms of mix, tenure and type, as well as designing and planning for housing to last.

**7.291** The remainder of the policies in this chapter are expected to have minor positive effects against this SA objective because they generally promote attractive, safe and functional housing design and place making.

**7.292** The strength and breadth of these requirements are equally likely to influence the likelihood for negative effects against this objective, as the more developers delivering homes have to invest in infrastructure, the more this will affect the viability and therefore the delivery of new, affordable homes in the District. Therefore, all the policies also record a minor negative effect against this SA objective.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.293** A **significant positive** effect is expected for the following policies against this objective:

- Strategic Policy 2: Planning for Healthy and Inclusive Communities.
- Place Making Policy 1: Achieving High Quality Design, Place Making and the provision of Design Codes
- Place Making Policy 2: Quality of Residential Accommodation.
- Place Making Policy 3: Providing Open Space.
- Place Making Policy 4: Sports Provision.

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<sup>51</sup> The policies contained within the Planning for Healthy and Inclusive Communities section of the Publication Local Plan were originally split between the Transport and Infrastructure and Design sections in the Draft Local Plan.

■ Place Making Policy 6: Community Facilities and Services.

**7.294** Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making policies 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) and 2 (Quality of Residential Accommodation) focus on achieving high-quality design that promotes sustainability, including active travel, green infrastructure and multi-functional open public spaces. Strategic Policy 2 (Planning for Healthy and Inclusive Communities) promotes development that is walkable or has access to public transport to access facilities and services. Development will also be well located, support a wide range of activities and encourage social interaction, along with the promotion of health, well-being and social inclusion. Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) requires development to maintain an attractive and coherent street scene that is inclusive for all users, whilst also ensuring a tenure blind approach to housing development. Place Making Policy 2 (Quality of Residential Accommodation) requires development to not lead to unacceptable living conditions such as, overlooking, noise, vibration, light pollution, odour, overshadowing, loss of natural light or sense of enclosure. It also sets out accessibility standards that are flexible and adaptive to meet the needs of an aging population. New residential development must also meet Part M4 of the Building Regulations meaning it is accessible.

**7.295** Place Making Policies 3 (Providing Open Space), 4 (Sports Provision) and 6 (Community Facilities and Services) requires new residential development to provide new strategic and local infrastructure and facility needs associated with new development, and make improvements to existing provision where appropriate. The provision of this infrastructure, services and facilities will improve resident, worker and visitor physical and mental health and well-being.

**7.296** Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) is likely to have mixed minor positive and minor negative effects because it protects the District's open spaces, sports facilities and LGS but also sets out the scenarios in which loss of open space may be permitted, albeit in relatively rare occasions.

**SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**7.297** Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) is expected to have a mixed **significant positive** effect in acknowledgement of the policy's promotion of good development design, place making and the need to meet changing local employment requirements in terms of mix, tenure and type.

**7.298** The remainder of the policies in this chapter are expected to have minor positive effects against this SA objective because they generally promote attractive, active, safe and functional housing design and place making and/or contribute to the protection and provision of important local services and facilities that contribute to making the District a better place to live and work.

**7.299** The strength and breadth of these requirements are equally likely to influence the likelihood for negative effects against this objective,. Therefore, all the policies also record a minor negative effect against this SA objective.

**SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.300** Strategic Policy 2 (Planning for Healthy and Inclusive Communities), Place Making Policy 1 (Achieving High Quality Design ,Placemaking and the provision of Design Codes) and Place Making Policy 6 (Community Facilities and Services) are likely to generate minor positive effects against this objective because they promote sustainable and active travel by connecting development with all transport modes, which will contribute to reducing the need to travel by private vehicle and reduce road congestion. Development must also make efficient use of land and promote forms of development that are walkable. Furthermore, good place making will mean developments are near transport hubs and settlement centres, and will have access to improved open space and local sport and community services which are required by PM3, PM4 and PM6. .

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.301** Placemaking Policy 1 (Achieving High Quality Design,Placemaking and the provision of Design Codes) is expected to have a minor positive effect against this objective.

**7.302** This is because this policy encourages efficient use of land with high-quality design that respects the character and context of the area. As such, development will not take up more land than is required, while still meeting the Nationally

Described Space Standards and Building Regulations. Furthermore, the policy promotes sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.303** Strategic Policy 2 (Planning for Healthy and Inclusive Communities), Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) and Place Making Policy 3 (Providing Open Space) are expected to have a minor positive effect against this objective. Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) seek to improve the District's air quality, reducing the public's exposure and reducing associated inequalities and prioritising sustainable and active travel by connecting development with all transport modes, which will contribute to reducing the need to travel by private vehicle and reduce road congestion and associated air pollution. Green open spaces, tree planting and walkable access to facilities and services is also encouraged. As such, good place making will mean developments are located near transport hubs or settlement centres. Place Making 3 (Providing Open Space) on the other hand is focussed on the provision of open space, including new and improved green infrastructure, which will contribute to air pollution dispersal.

**7.304** Place Making 5 (Protection of Open Space, Sports Facilities and Local Green Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which help to disperse air pollution. However, the policy also sets out scenarios in which loss of open space and Local Green Space may be permitted, albeit in relatively rare occasions, which may result in less scope to disperse air pollution in certain locations.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.305** Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 1 (Achieving High Quality Design Placemaking, and the provision of Design Codes) are expected to have a minor positive effect against this objective as they require developments to deliver climate change resilience through flood mitigation and multifunctional greenspaces. Furthermore, the policies encourage development to protect and enhance existing features such as trees and natural habitats, which will contribute to reducing flood risk. Creating and retaining green landscapes will help to reduce the urban heat island effect in densely populated areas.

**7.306** A minor positive effect is also recorded for Place Making Policy 3 (Providing Open Spaces). This is because this policy focusses on the provision of open space, including new and improved green infrastructure, which will contribute to reducing the adverse effects of the urban heat island effect and flooding.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.307** Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) are expected to have a minor positive effect against this objective. This is because the policies encourage sustainable and active travel, which will contribute to reducing the need to travel by private vehicle and reduce road congestion. This will lead to a reduction in air pollution, as well as greenhouse gas emissions contributing to climate change.

**7.308** Place Making Policy 3 (Providing Open Space) is also expected to have a minor positive effect against this objective because the policy focusses on the provision of open space, including new and improved green infrastructure, which will contribute to carbon sequestration.

**7.309** Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which help to sequester carbon in the District before it reaches the atmosphere. However, the policy also sets out scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which may result in less scope to sequester carbon in certain locations.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.310** Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 1 (Achieving High Quality Design Placemaking and the provision of Design Codes) are expected to have a minor positive effect against this objective, as

these policies ensure development protects and enhances natural habitats and green infrastructure. Developments are expected to provide high-quality green open spaces, incorporating trees and other planting into the public realm. Developments must also ensure that existing features, including trees, natural habitats and boundary treatments are retained, protected and enhanced.

**7.311** A minor positive effect is also expected for Place Making Policy 3 (Providing Open Space). This is because this policy focusses on the provision of open space, including new and improved green infrastructure, which will contribute to the enhancement of the biodiversity of the District's urban areas.

**7.312** Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which may contain species and habitats. However, it does make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions, which has the potential to reduce the extent and diversity of habitats in certain locations.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.313** Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) are expected to have a minor positive effect against this objective, as these policies require development to create a strong sense of place, drawing inspiration from culture and achieving a high standard of design. Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) requires development to respect and enhance the existing character, including historic character, of an area by paying particular attention to developments location, scale, massing, rhythm, layout and use of materials appropriate to its locality. As such, development should appreciate the existing form and respond positively to it, which will have a positive effect on the historic environment.

**7.314** Place Making Policy 3 (Providing Open Space) is also expected to have a minor positive effect against this objective, by virtue of the fact that it promotes the provision of new and improved open spaces, which generally offer greater scope to maintain and enhance the setting and special character of the District's historic assets and landscapes.

**7.315** Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space, and the loss of open space will not be permitted if open space provides the setting for important buildings or scheduled ancient monuments of historic or cultural value. However, it does make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions. This might include adverse effects to the setting of other historic assets or landscapes.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.316** Place Making Policy 1 (Achieving High Quality Design, Placemaking and the provision of Design Codes) is expected to have a **significant positive** effect against this objective, as the policy requires new development to be well designed to respect and enhance local character and distinctiveness, appreciating the existing form of landscapes and townscapes, drawing inspiration from traditional building forms and using contemporary materials and design. The policy explicitly refers to the production of a District wide Design Code and locally specific Design Codes for areas in the District where substantial development is proposed. Furthermore, development is encouraged to include enhanced green infrastructure and public realm, which will contribute significantly to the District's landscapes and townscapes.

**7.317** A minor positive effect is also expected for Strategic Policy 2 (Planning for Healthy and Inclusive Communities) and Place Making Policy 3 (Providing Open Space). The former ensures that all new development achieves a high standard of design both internally and externally. The latter focusses on the provision of open space, including new and improved green infrastructure, which will contribute to the enhancement of the District's landscapes and townscapes.

**7.318** Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) is expected to have a mixed minor positive and minor negative effect against this objective. This is because this policy promotes the protection of open space including playing fields and allotments, which maintain the open character and distinctiveness of parts of the District's landscapes and townscapes. However, it does make provision for scenarios in which loss of open space may be permitted,

albeit in relatively rare occasions, which has the potential to have the opposite effect, reducing openness and permitting the expansion of the urban area.



Table 7.11: Likely effects of Publication Local Plan planning for healthy and inclusive communities policies

Planning for Healthy and Inclusive Communities Policies / SA Objectives	Strategic Policy 2: Planning for Healthy and Inclusive Communities	Place Making Policy 1: Achieving High Quality Design, Placemaking and the provision of Design Codes	Place Making Policy 2: Quality of Residential Accommodation	Place Making Policy 3: Providing Open Space	Place Making Policy 4: Sports Provision	Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space	Place Making Policy 6: Community Facilities and Services.
SA1: Housing	+/-	++/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and well-being	++	++	++	++	++	+/-	++
SA3: Employment	+/-	++/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	+	+	0	0	0	0	+
SA5: Resources	0	+	0	0	0	0	0
SA6: Air pollution	+	+	0	+	0	+/-	0
SA7: Flood risk	+	+	0	+	0	0	0
SA8: Climate change	+	+	0	+	0	+/-	0
SA9: Biodiversity	+	+	0	+	0	+/-	0
SA10: Historic environment	+	+	0	+	0	+/-	0
SA11: Landscape	+	++	0	+	0	+/-	0
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+	Minor positive effect likely	+/- Mixed minor effect likely	0 Negligible effect likely	

### Planning for healthy and inclusive communities policy recommendations

**7.319** No additional recommendations on the Council's planning for healthy and inclusive communities policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**<sup>52</sup>.

### New Homes Policies

**7.320** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define 10 new homes policies in the Publication Local Plan:

- Strategic Policy 3: Housing Growth.
- Strategic Policy 4: Residential Windfall Development.
- Strategic Policy 5: Affordable Housing.
- Housing Policy 1: Type and Mix of Housing.
- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 3: Meeting the needs of Gypsies and Travellers.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.
- Housing Policy 5: Self-build and Custom Housebuilding .
- Housing Policy 6: Residential Extensions and Annexes.
- Housing Policy 7: Houses in Multiple Occupation.

### Reasonable alternatives SA

**7.321** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains largely the same as the justification given for the relevant preferred policies in **Chapter 6**. However, it should be noted that Policy SP3 represents a combination of the growth options previously tested in **Chapter 4**. Further justification can be found in the Publication Local Plan.

### New homes policies SA

**7.322** **Table 7.12** sets out the likely effects of the Publication Local Plan new homes policies. The reasoning for the identification of these likely effects is set out by SA objective below.

**7.323** Based upon the most up to date data, the current Local Housing Need figure for the District is 611 dwellings per annum (dpa), which equates to an overall need of 10,998 new homes over the Plan period. Strategic Policy 3 (Housing Growth) has been appraised below, with the delivery of new homes achieved through the allocation of 71 residential sites. These residential site allocations have been appraised throughout the 'Strategic and Non-Strategic Housing, Employment and Mixed-Use Allocation Policies' section in this chapter of the SA Report.

**7.324** During 2021, the Government announced a new preferred affordable home ownership product 'First Homes' which is now set out in Planning Practice Guidance. A study has been completed by HDH Planning & Development to support the Local Plan which assessed the future demand for First Homes in the district and the policy implications. The results of this study have led to the proposed tenure split in the Affordable Housing policy.

**7.325** Based upon the most up to date data, there is a cultural need for 26 Gypsy and Traveller pitches and a National Planning Policy for Traveller Sites (PPTS) need for 16 pitches, totalling 42 pitches. Four reasonable gypsy and traveller site options have been appraised in **Chapter 5** of the SA (see **Table 5.6**). However, no gypsy and traveller sites have been allocated in the Publication Local Plan, in favour of meeting future needs through existing gypsy and traveller site intensification. The effects of intensification within established gypsy and traveller sites are appraised through Housing Policy 3 (Meeting the needs of Gypsies and Travellers) below.

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<sup>52</sup> The policies contained within the Planning for Healthy and Inclusive Communities section of the Publication Local Plan were originally split between the Transport and Infrastructure and Design sections in the Draft Local Plan.

### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.326** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs over the Plan period and is therefore likely to generate a **significant positive** effect against this SA objective. The majority of the other housing policies also have the potential to generate **significant positive** effects against this SA objective, for the significant number of homes they will deliver and/or their focus on the delivery of a specific type of needed home:

- Strategic Policy 5: Affordable Housing.
- Housing Policy 1: Type and Mix of Housing.
- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 3: Meeting the needs of Gypsies and Travellers.
- Housing Policy 5: Self-build and Custom Housebuilding
- Housing Policy 6: Residential Extensions and Annexes.
- Housing Policy 7: Houses in Multiple Occupation.

**7.327** The **significant positive** effects for Strategic Policy 3 (Housing Growth) and Housing Policy 3 (Meeting the needs of Gypsies and Travellers) are coupled with some uncertainty in acknowledgement of the fact that the Plan relies on some windfall sites (roughly 1,000 homes and 9 pitches) over the Plan period. Although these estimates are realistic and unlikely to result in an under provision of housing, the absence of clearly identified sites for all needs introduces some uncertainty.

**7.328** The **significant positive** effect for Strategic Policy 5 (Affordable Housing) is coupled with the potential for a **significant negative** effect in acknowledgement of the fact that the policy does not require the delivery of affordable homes in the District's largest settlement: Dover. Therefore, in Dover, there is a risk that not everyone will be able to access an affordable home.

**7.329** Minor positive effects are recorded for the following policies:

- Strategic Policy 4: Residential Windfall Development.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.
- Housing Policy 5: Self-build and Custom Housebuilding.

**7.330** This is acknowledgement of the valuable contribution non-allocated housing delivery can make to the District's housing need, albeit at relatively smaller scales. A mixed minor positive and minor negative effect is recorded for Housing Policy 5 (Self and Custom Build Housing) in acknowledgement of the fact that the policy does not specify the specific type and locations such housing will be delivered. Therefore, despite there being a relatively small need for self and custom build homes in the District, there is the possibility that needs will not be met within the Plan period.

### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.331** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective. However, a number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed **significant positive** and minor negative effect overall.

**7.332** **Significant positive** effects are recorded for the following policies:

- Strategic Policy 5: Affordable Housing.
- Housing Policy 1: Type and Mix of Housing.
- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 3: Meeting the needs of Gypsies and Travellers.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.

**7.333** This is in acknowledgement of the important role delivering these various types of local housing needs have on the health and well-being of the District's local population. Housing Policy 3 (Meeting the needs of Gypsies and Travellers) meets future

pitch needs through the protection and intensification of existing gypsy and traveller sites in the District. The existing sites have been determined to be fit for purpose and appropriately located, therefore minor to moderate intensification in these locations is not considered to generate adverse effects against this objective. Housing Policy 4 (Gypsy and Traveller Windfall Accommodation) requires sites to provide a good living environment free from risks to health. The **significant positive** effect for Strategic Policy 5 (Affordable Housing) is coupled with the potential for minor negative effect in acknowledgement of the fact that the policy does not require the delivery of affordable homes in the District's largest settlement: Dover. Therefore, in Dover, there is a risk that not everyone will be able to access an affordable home.

**7.334** A minor positive effect is expected for the following policies against this objective:

- Housing Policy 5: Self-build and Custom Housebuilding .
- Housing Policy 6: Residential Extensions and Annexes.
- Housing Policy 7: Houses in Multiple Occupation.

**7.335** This is acknowledgement of valuable contribution some of the less common forms of housing can make to the health and well-being of the specific portions of the District's population that need and/or want them, helping provide everyone with somewhere to live. Housing Policy 6 (Residential Extensions and Annexes) and Housing Policy 7 (Houses in Multiple Occupation) require development to not have any adverse impact on the living conditions of existing residents.

**7.336** A minor negative effect is recorded for Housing Policy 5 (Self-build and Custom housebuilding) in acknowledgement of the fact that the policy does not specify the specific type and locations such housing will be delivered.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.337** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective. However, a number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of employment opportunities is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available, resulting in a mixed **significant positive** and minor negative effect overall.

**7.338** A minor positive effect is expected for Housing Policy 6 (Residential Extensions and Annexes) against this objective, as the policy supports the development of extensions and annexes, which will allow people to create space for home working.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.339** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective by contributing to minimising the need for people to travel and alleviating traffic congestion through the diversification of sustainable transport options. However, a number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed **significant positive** and minor negative effect overall.

**7.340** A minor positive effect is expected for Housing Policy 6 (Residential Extensions and Annexes) because the policy offers greater scope for residents to work from home or set-up home businesses, reducing the need for commuting and its associated impact on road congestion at peak times.

**7.341** A minor negative effect is expected for Strategic Policy 4 (Residential Windfall Development) against this objective because the policy requires demonstration that traffic generated from the development does not result in severe impacts to the highway network that cannot be mitigated, allowing scope for some adverse effects.

**7.342** Minor negative effects are also recorded for Housing Policy 2 (Rural Local Needs Housing) and Housing Policy 7 (Houses in Multiple Occupation). Housing Policy 2 (Rural Local Needs Housing) allows local needs housing schemes in rural areas, which could be hard to access and rely on private vehicles to access employment, services and facilities. The road network may also not be able to meet the additional demand, although the policy does require demonstration that traffic generated from the development can be safely accommodated, which will help to minimise the potential adverse effects. Housing Policy 7 (Houses in Multiple Occupation) prohibits unacceptably harmful impacts on highway safety and increases in on street parking, implying that some adverse effects may be acceptable.

**7.343** Housing Policy 3 (Meeting the needs of Gypsies and Travellers) meets future pitch needs through the protection and intensification of existing gypsy and traveller sites in the District. The existing sites have been determined to be fit for purpose and appropriately located, therefore minor to moderate intensification in these locations is not considered to generate adverse effects against this objective.

**7.344** Housing Policy 4 (Gypsy and Traveller Windfall Accommodation) is expected to have a mixed minor positive and minor negative effect against this objective. This is in acknowledgment of the policy's requirement for gypsy and traveller windfall development to be accessible to schools, health and local services, which will minimise travel distance, but the policy also prioritises road access and the provision of sufficient car parking facilities for residents and visitors, promoting use of private vehicles.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.345 Significant negative** effects are recorded for Strategic Policy 3 (Housing Growth).

**7.346** This is in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. Furthermore, a significant proportion of the housing allocations sit within areas safeguarded for future mineral extraction. The allocations' development through the Plan period will result in the loss of these valuable and irreplaceable natural resources.

**7.347** A mixed minor effect is recorded for Strategic Policy 4 (Residential Windfall Development) because it requires windfall development to not result in the significant loss of best and most versatile agricultural land, allowing scope for some adverse effects, despite discouraging the loss of high quality agricultural land overall.

**7.348** Housing Policy 3 (Meeting the needs of Gypsies and Travellers) meets future pitch needs through the protection and intensification of existing gypsy and traveller sites in the District. The existing sites have been determined to be fit for purpose and appropriately located, therefore minor to moderate intensification in these locations is not considered to generate adverse effects against this objective.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.349** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective by contributing to minimising the need for people to travel and alleviating traffic congestion and associated air pollution through the diversification of sustainable transport options. However, a number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective.

**7.350** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available, resulting in a mixed **significant positive** and minor negative effect overall.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.351** Housing Policy 3 (Meeting the needs of Gypsies and Travellers) meets future pitch needs through the protection and intensification of existing gypsy and traveller sites in the District, whilst Housing Policy 4 (Gypsy and Traveller Windfall Accommodation) provides some flexibility in terms of housing delivery via windfall sites. Both of these policies require a site-

specific Flood Risk Assessment to be undertaken for any site identified as being at risk of surface water flooding, to inform whether the Sequential Approach should be applied and/or SuDS incorporated into development. With regards to Housing Policy 3, the existing sites have been determined to be fit for purpose and appropriately located, therefore minor to moderate intensification in these locations is not considered to generate adverse effects against this objective. The incorporation of SuDS would help mitigate flood risk for both policies and therefore, overall, a minor positive but uncertain effect is expected against this objective.

**7.352** Minor adverse effects are recorded for Strategic Policy 3 (Housing Growth) in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land and vegetation performing an important cooling and water sequestration role. The loss of this land to development will generally increase the likelihood of surface water flooding and extreme heat in the developed parts of the District. A significant proportion of the site allocations are located on land with the potential for surface water flooding, the risk of which is likely to increase with their development. The Flood Risk Assessments that have been undertaken for the proposed allocations coupled with the incorporation of green infrastructure and sustainable urban drainage systems within such developments is considered to mitigate the significance of these adverse effects to minor negative effects.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.353** The housing growth and spatial strategy set out in Strategic Policy 3 (Housing Growth) aims to deliver the District's housing needs where it is needed, and where accessibility to job opportunities, local services and facilities and strategic and public transport is good. Therefore, this policy is likely to generate **significant positive** effects against this SA objective, by virtue of the fact the spatial strategy aims to strike a sustainable balance that minimises the need for new communities to travel privately via unsustainable modes of transport. However, a number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of employment opportunities is less readily available, resulting in the potential for some adverse effects against this SA objective.

**7.354** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available, resulting in a mixed **significant positive** and minor negative effect overall.

**7.355** Housing Policy 3 (Meeting the needs of Gypsies and Travellers) meets future pitch needs through the protection and intensification of existing gypsy and traveller sites in the District. The existing sites have been determined to be fit for purpose and appropriately located, therefore minor to moderate intensification in these locations is not considered to generate adverse effects against this objective.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.356** Precautionary uncertain minor adverse effects are recorded for Strategic Policy 3 (Housing Growth). This is in acknowledgement of the findings of the Habitats Regulations Assessment (HRA) of the Publication Local Plan. The HRA concludes that no adverse effects on the integrity of local European sites will occur, provided the safeguarding and mitigation measures outlined in the HRA are implemented. However, a significant proportion of the proposed housing growth will be located on greenfield land and in close proximity to sensitive ecological habitats. Several of the allocations are located in close proximity to European Sites and/or Sites of Special Scientific Interest (SSSIs) and fall within their Impact Risk Zones defined by Natural England. Site allocations lie in close proximity to recognised priority habitats, ancient woodland and/or local wildlife sites, resulting in the potential to adversely affect habitats directly or indirectly in close proximity, from a range of sources through for example recreation disturbance or poorer air quality.

**7.357** Minor positive effects are expected for the following policies against this objective:

- Strategic Policy 4: Residential Windfall Development.
- Housing Policy 3: Meeting the Needs of Gypsies and Travellers.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.
- Housing Policy 6: Residential Extensions and Annexes.

**7.358** Strategic Policy 4 (Residential Windfall Development) requires windfall development to conserve and enhance biodiversity, and not result in the loss of important green spaces. The remaining policies listed above require housing to conserve and enhance the environment, resulting in a minor positive effect overall.

**7.359** Mixed minor positive and minor negative effects are expected for the following policies against this objective:

- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 5: Self-build and Custom Housebuilding.

**7.360** Housing Policy 2 (Rural Local Needs Housing) facilitates more development in rural areas where there is generally greater potential for adverse effects on the natural environment, although this is partially mitigated by the policy's requirement for to conserve and enhance the environment. Housing Policy 5 (Self-build and Custom Housebuilding ) requires housing to be in keeping with the character of the environment, but does not rule out the potential for some harm overall, resulting in a minor mixed effect overall.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.361** Minor adverse effects are recorded for Strategic Policy 3 ( Housing Growth). This is in acknowledgement of the fact that a significant proportion of the proposed housing growth will be located in close proximity to known historic assets or within historic landscapes or townscapes.

**7.362** A minor positive effect is expected for the following policies against this objective:

- Strategic Policy 4: Residential Windfall Development.
- Housing Policy 3: Meeting the Needs of Gypsies and Travellers.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.
- Housing Policy 6: Residential Extensions and Annexes.

**7.363** Strategic Policy 4 (Residential Windfall Development), Housing Policy 4 (Gypsy and Traveller Windfall Accommodation) and Housing Policy 6 (Residential Extensions and Annexes) require development to protect and enhance Heritage Coasts, whilst also demonstrating that development is limited, sensitively located and designed to avoid or minimise adverse impacts. There is also a requirement within these policies to preserve or enhance any heritage assets within the setting of development. The remaining policies listed above seek to conserve and enhance the character and appearance of the environment, which includes historic assets.

**7.364** A mixed minor positive and minor negative effect is expected for the following policies against this objective:

- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 5: Self-build and Custom Housebuilding.

**7.365** Housing Policy 2 (Rural Local Needs Housing) facilitates more development in rural areas where there is generally greater potential for adverse effects on historic landscapes and assets in the open countryside and wider settings, although this is partially mitigated by the policy's requirement to conserve and enhance the character and appearance of the environment, including Heritage Coasts, whilst also demonstrating that development is limited, sensitively located and designed to avoid or minimise adverse impacts. Housing Policy 5 (Self-build and Custom Housebuilding) requires housing to be in keeping with the character of the environment, but does not rule out the potential for some harm overall, resulting in a minor mixed effect overall.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.366 Significant positive** effects are recorded for Strategic Policy 4 (Residential Windfall Development).

**7.367** This is in acknowledgement of the fact that residential windfall development is required to conserve and enhance landscape character. Development proposals are required to be of a scale that is appropriate to the size of the relevant settlement, sensitively located and compatible with the layout, density, fabric and appearance of the settlement, in addition to individually or cumulatively not resulting in coalescence or the merging of separate settlements so as to retain their individual identities.

**7.368** Minor adverse effects are recorded for Strategic Policy 3 (Housing Growth), in acknowledgement of the fact that a significant proportion of the proposed housing growth will be located in close proximity to known sensitive landscapes or townscapes.

**7.369** A minor positive effect is expected for the following policies against this objective:

- Housing Policy 3: Meeting the Needs of Gypsies and Travellers.
- Housing Policy 4: Gypsy and Traveller Windfall Accommodation.
- Housing Policy 6: Residential Extensions and Annexes.

**7.370** Each of these policies require development proposals to conserve and enhance the character and appearance of the landscape, and for any proposals to be well-screened by vegetation.

**7.371** A mixed minor positive and minor negative effect is expected for the following policies against this objective:

- Housing Policy 2: Rural Local Needs Housing.
- Housing Policy 5: Self-build and Custom Housebuilding.

**7.372** Housing Policy 2 (Rural Local Needs Housing) facilitates more development in rural areas where there is generally greater potential for adverse effects on the open countryside and sensitive landscapes, although this is partially mitigated by the policy's requirement to conserve and enhance the character and appearance of the landscape, and for proposals to be well-screened by vegetation. Housing Policy 5: Self-build and Custom Housebuilding requires housing to be in keeping with the character of the environment, but does not rule out the potential for some harm, resulting in a minor mixed effect overall.



Table 7.12: Likely effects of Publication Local Plan new homes policies

New Homes Policies / SA Objectives	Strategic Policy 3: Housing Growth	Strategic Policy 4: Residential Windfall Development	Strategic Policy 5: Affordable Housing	Housing Policy 1: Type and Mix of Housing	Housing Policy 2: Rural Local Needs Housing	Housing Policy 3: Meeting the needs of Gypsies and Travellers	Housing Policy 4: Gypsy and Traveller Windfall Accommodation	Housing Policy 5: Self-Build and Custom Housebuilding	Housing Policy 6: Residential Extensions and Annexes	Housing Policy 7: Houses in Multiple Occupation
SA1: Housing	++?	+	++/--	++	++	++?	+	+/-	++	++
SA2: Health and well-being	++/-	0	++/-	++	++	++	+	+/-	+	+
SA3: Employment	++/-	0	0	0	0	0	0	0	+	0
SA4: Transport	++/-	-	0	0	-	0	+/-	0	+	-
SA5: Resources	--		0	0	0	0	0	0	0	0
SA6: Air pollution	++/-	0	0	0	0	0	0	0	0	0
SA7: Flood risk	-	0	0	0	0	+	+	0	0	0
SA8: Climate change	++/-	0	0	0	0	0	0	0	0	0
SA9: Biodiversity	-?	+	0	0	+/-	+	+	+/-	+	0
SA10: Historic environment	-	+	0	0	+/-	+	+	+/-	+	0
SA11: Landscape	-	++	0	0	+/-	+	+	+/-	+	0
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+	Minor positive effect likely	+/- or ++/-- Mixed minor or significant effect likely	-	Minor negative effect likely	-- Significant negative effect likely	0 Negligible effect likely	

### New homes policy recommendations

**7.373** The uncertainty recorded against Strategic Policy 3 (Housing Growth) and Housing Policy 3 (Meeting the needs of Gypsies and Travellers) could be avoided through the identification of an additional roughly 1,000 homes and 9 pitches in the Plan period instead of relying on windfall sites. However, it is noted that an 8.4% (926 home) supply contingency buffer is provided. In accordance with the provisions of the NPPF, an allowance has been made for windfall development in the council's housing land supply. The windfall contribution from small sites of less than five new dwellings to the overall supply of housing is 70 dwellings per annum – based on the annual average of past trends from this source since adoption of the Core Strategy in 2010. The contribution from small windfall sites is considered appropriate from year 4 of the remaining Plan period to avoid any double counting from windfall sites that have already received planning permission and are counted within the extant permissions. Therefore, it is considered justified and deliverable to include a windfall allowance of 1,050 dwellings in the anticipated housing supply for the Plan period. With regards to the gypsy and traveller shortfall of nine pitches in the final five years of the Plan based upon the GTAA requirements, national policy does not require the Council to identify sites for this period, and suitable sites may come forward through windfall proposals across the plan period that are not currently known. Policy H4 (Gypsy and Traveller Windfall Accommodation) of the Local Plan enables the Council to deal with planning applications for Gypsy and Traveller sites on a site-by-site basis, subject to individual circumstances and need.

**7.374** A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**.

### Employment and Local Economy Policies

**7.375** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define five employment and local economy policies in the Publication Local Plan:

- Strategic Policy 6: Economic Growth.
- Employment Policy 1: New Employment Development.
- Employment Policy 2: Loss or Redevelopment of Employment Sites and Premises.
- Employment Policy 3: Businesses Operating from a Residential Property.
- Employment Policy 4: Tourism Accommodation and Attractions.

### Reasonable alternatives SA

**7.376** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. However, it should be noted that Policy SP6 represents a higher growth option to those previously tested in **Chapter 4**. Further justification is provided in the Publication Local Plan.

### Employment and local economy policies SA

**7.377** **Table 7.13** sets out the likely effects of the Publication Local Plan employment and local economy policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.378** Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises) is considered to have a minor positive effect on this SA objective because it sets out the conditions within which employment sites or land can be used for alternative uses, offering flexibility to deliver more homes in the District under certain circumstances.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.379** The economic growth and spatial strategy set out in Strategic Policy 6 (Economic Growth) aims to deliver a minimum of 117,290sqm of new employment floorspace (31.1ha in land terms) over the Plan period, meeting at least the District's identified needs and consequently promoting economic prosperity, job growth, tourism and inward investment to deliver economic growth in the District. Furthermore, the policy safeguards existing industrial/ commercial/ business land, premises and estates and promotes town centre and rural employment opportunities. This has the potential to generate a **significant positive** effect against this SA objective by focussing economic growth where it is needed and in the most sustainable locations in the District.

However, the intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more noise, air and light pollution, resulting in the potential for some adverse effects against this SA objective.

**7.380** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy focussing on areas of existing activity, resulting in a mixed **significant positive** and minor negative effect overall.

**7.381** The majority of the allocated site areas are already developed and/or in use as employment sites and their retention reduces the need to develop new employment sites elsewhere, limiting the potential of exposing new communities to the sources of pollution that might be generated by new employment sites. However, some of the sites lie within close proximity to Air Quality Management Areas (AQMA) – notably Site 18 (Dover Waterfront). Therefore, intensification of land uses at these premises has the potential to further reduce local poor air quality, which has the potential to adversely affect nearby residents, workers and visitors. Given these employment sites are already established, these effects are recorded as minor. Furthermore, Site 14 (Land off Holt Street/Snowdown Colliery) is in close proximity to known mine entries which may pose a health and safety risk.

**7.382** Employment Policy 1 (New Employment Development), Employment Policy 3 (Businesses Operating from a Residential Property) and Employment Policy 4 (Tourism Accommodation and Attractions) are expected to generate a minor positive effect against this objective. This is because these policies all seek to protect the amenity and/or quality of life of local people and visitors through the developments they manage. Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises) is also expected to generate a minor positive effect against this objective because it only supports the conversion of employment sites to alternative uses when the replacement use is compatible with the uses in the surrounding area.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.383** A **significant positive** effect is expected for the following employment and local economy policies against this SA objective:

- Strategic Policy 6: Economic Growth.
- Employment Policy 1: New Employment Development.
- Employment Policy 4: Tourism Accommodation and Attractions.

**7.384** This is because these policies support the Council's aspiration to deliver at least the District's minimum economic growth needs through the diversification of the economy, investment in infrastructure and the potential development of significant new employment premises, along with the development of new tourism attractions and holiday accommodation.

**7.385** Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises) and Employment Policy 3 (Businesses Operating from a Residential Property) are expected to generate a minor positive effect as these policies protect existing employment premises and facilitate investment in new business opportunities, with net benefits for the local economy. However, a minor negative effect is also recorded for Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises), resulting in a mixed minor positive and minor negative effect overall. This is because the policy sets out the circumstances in which employment sites or premises can be lost or redeveloped for other uses, offering scope for a general reduction in the extent of employment opportunities in certain parts of the District, albeit in relatively rare circumstances.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.386** The economic growth and spatial strategy set out in Strategic Policy 6 (Economic Growth) aims to deliver a minimum of 117,290sqm of new employment floorspace (31.1ha in land terms) over the Plan period, meeting at least the District's identified needs and consequently promoting economic prosperity, job growth, tourism and inward investment. Furthermore, the policy safeguards existing industrial/ commercial/ business land, premises and estates and promotes town centre and rural employment opportunities. The intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's aim to focus the majority of the growth in established and accessible locations.

**7.387** A minor positive effect is expected for Employment Policy 3 (Businesses Operating from a Residential Property) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more

home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network during commuting hours and therefore positively contributing to reducing congestion.

**7.388** A mixed minor positive and minor negative effect is recorded for Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) against this objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of some adverse effects on the highway network. The policies do, however, seek to improve provision of sustainable travel options, resulting in a minor mixed effect overall.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.389** Mixed **significant positive** and **significant negative** effects are recorded for Strategic Policy 6 (Economic Growth) against this SA objective. The **significant positive** effects acknowledge the focus on the intensification of economic growth within the District's existing employment sites and town centres, minimising the loss of further greenfield land elsewhere. However, some of the employment sites contain areas of greenfield land designated as some of the best and most versatile agricultural land in the District, are safeguarded for their mineral resources or sit on top of sensitive source protection zones. For example, the southward expansion of the employment land at Aylesham (Site 4: Aylesham Development Area).

**7.390** Minor negative effects are expected for Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) against this objective, as the policies facilitate the development of new employment and tourism attractions that have the potential to be developed on greenfield land, where there is greater scope to lose natural resources.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.391** The economic growth and spatial strategy set out in Strategic Policy 6 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment. One of the existing employment sites (Site 18 (Dover Waterfront)) lies within and close proximity to Air Quality Management Areas (AQMA) and is prone to congestion. Intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy focussing on existing, accessible and central employment locations.

**7.392** A minor positive effect is expected for Employment Policy 3 (Businesses Operating from a Residential Property) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network during commuting hours and therefore positively contributing to reducing congestion and the associated concentration of air pollution on the strategic highway network.

**7.393** A mixed minor positive and minor negative effect is recorded for Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) against this objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of increasing the number of cars on the District's roads, resulting in the potential for more road-based air pollution. The policies do, however, seek to improve provision of sustainable travel options, resulting in a minor mixed effect overall.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.394** Minor adverse effects are recorded for Strategic Policy 6 (Economic Growth). Although the vast majority of the allocations cover existing employment sites with integrated urban drainage systems, some greenfield land lies within these locations and some sites contain flood risk zones and/or land known to be vulnerable to surface water flooding. Intensification/densification as a result of economic growth will generally increase the likelihood of flooding and extreme heating in the developed parts of the District.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.395** The economic growth and spatial strategy set out in Strategic Policy 6 (Economic Growth) aims to deliver economic prosperity, job growth, tourism and inward investment. The intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to increase greenhouse gas emissions, at least in the short to medium term. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the general focus on existing, accessible and central employment locations and the trend towards more homeworking/remote and coworking facilities.

**7.396** A minor positive effect is expected for Employment Policy 3 (Businesses Operating from a Residential Property) against this objective, as the policy supports the establishment of businesses operating from residential properties, facilitating more home working. This will have the indirect benefit of reducing the frequency of commuting in the District, reducing the number of vehicles on the District's road network during commuting hours and therefore positively contributing to reducing congestion and greenhouse gas emissions associated with vehicle use.

**7.397** A mixed minor positive and minor negative effect is recorded for Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) against this objective. This is because the policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of increasing the number of cars on the District's roads, resulting in the potential for more road-based travel and associated greenhouse gas emissions. The policies do, however, seek to improve provision of sustainable travel options, resulting in a minor mixed effect overall.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.398** Minor negative effects are recorded for Strategic Policy 6 (Economic Growth). The HRA concludes that no adverse effects on the integrity of local European sites will occur, provided the safeguarding and mitigation measures outlined in the HRA are implemented. However, some site allocations are located on greenfield land and in close proximity to sensitive ecological habitats. Some of the employment allocations are located in close proximity to European and/or Sites of Special Scientific Interest (SSSIs) and fall within their Impact Risk Zones defined by Natural England. Others contain and lie in close proximity to recognised priority habitats and other local wildlife sites. All the allocations generally cover existing operational employment sites, limiting the potential significant adverse effects on local ecology, but there is still potential to adversely affect habitats directly or indirectly in close proximity over the Plan period, through noise, light, water and air pollution.

**7.399** A minor positive effect is expected for Employment Policies 1 (New Employment Development) and 4 (Tourism Accommodation and Attractions). This is because the policies require employment development to conserve and enhance the environment, in addition to ensuring that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.400** A minor negative effect is expected for Strategic Policy 6 (Economic Growth). Many of the employment allocations are located in close proximity to known historic assets. Given most allocations generally cover existing operational employment sites it is considered that any significant negative effects on the significance or setting of these assets have already occurred or have been mitigated, limiting the potential for further significant adverse effects in the Plan period. However, the intensification/densification of economic activity and development in these locations results in the potential for additional adverse effects on visual setting or more directly through noise, light, water and air pollution.

**7.401** A minor positive effect is expected for Employment Policies 1 (New Employment Development) and 4 (Tourism Accommodation and Attractions). This is because the policies require employment development in to conserve and enhance the environment, which includes historic assets, in addition to ensuring that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.402** A minor negative effect is expected for Strategic Policy 6 (Economic Growth). Some of the employment allocations are located in the open countryside where there is greater potential to adversely affect sensitive landscape assets, for example Site 15 near Eastry and Site 14 near Aylesham and Snowdown. Given most allocations generally cover existing operational employment sites it is considered that any significant negative effects on the significance or setting of sensitive landscape and townscape features have already occurred or have been mitigated, limiting the potential for further significant adverse effects in the Plan period. However, the intensification/densification of economic activity and development in these locations results in the potential for additional adverse effects on visual setting or more directly through noise, light, water and air pollution.

**7.403** A minor positive effect is expected for Employment Policies 1 (New Employment Development) and 4 (Tourism Accommodation and Attractions). This is because the policies require employment development to conserve and enhance the character and appearance of the landscape.

Table 7.13: Likely effects of Publication Local Plan employment and local economy policies

Employment and Local Economy Policies / SA Objectives	Strategic Policy 6: Economic Growth	Employment Policy 1: New Employment Development	Employment Policy 2: Loss or Redevelopment of Employment Sites and Premises	Employment Policy 3: Businesses Operating from a Residential Property	Employment Policy 4: Tourism Accommodation and Attractions	
SA1: Housing	0	0	+	0	0	
SA2: Health and well-being	++/-	+	+	+	+	
SA3: Employment	++	++	+/-	+	++	
SA4: Transport	-	+/-	0	+	+/-	
SA5: Resources	++/--	-	0	0	-	
SA6: Air pollution	-	+/-	0	+	+/-	
SA7: Flood risk	-	0	0	0	0	
SA8: Climate change	-	+/-	0	+	+/-	
SA9: Biodiversity	-	+	0	0	+	
SA10: Historic environment	-	+	0	0	+	
SA11: Landscape	-	+	0	0	+	
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+ Minor positive effect likely	+/- or ++/-- Mixed minor or significant effect likely	- Minor negative effect likely	0 Negligible effect likely

### Employment and local economy policy recommendations

**7.404** No additional recommendations on the Council's employment and local economy policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**.

### Retail and Town Centre Policies

**7.405** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define eight retail and town centre policies in the Publication Local Plan:

- Strategic Policy 7: Retail and Town Centres.
- Strategic Policy 8: Dover Town Centre.
- Strategic Policy 9: Deal Town Centre.
- Strategic Policy 10: Sandwich Town Centre.
- Retail Policy 1: Primary Shopping Areas.
- Retail Policy 2: Sequential Test and Impact Assessment.
- Retail Policy 3: Local Shops.
- Retail Policy 4: Shopfronts.

### Reasonable alternatives SA

**7.406** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. Further justification can be found in the Publication Local Plan.

### Retail and town centre policies SA

**7.407** **Table 7.14** sets out the likely effects of the Publication Local Plan retail and town centre policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.408** A minor positive effect is expected for the following policies against this objective:

- Strategic Policy 7: Retail and Town Centres.
- Strategic Policy 8: Dover Town Centre.
- Strategic Policy 9: Deal Town Centre.
- Strategic Policy 10: Sandwich Town Centre.
- Retail Policy 1: Primary Shopping Areas.
- Retail Policy 3: Local Shops.

**7.409** Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) support residential development in town centres, including using the space from the first floor upwards under Strategic Policy 8. Strategic Policy 7 (Retail and Town Centres) promotes the identification of opportunities for residential provision in and on the edge of town centres, whilst Retail Policy 1 (Primary Shopping Areas) supports using the space above shops for residential uses and re-using or re-developing existing buildings. Retail Policy 3 (Local Shops) aims to protect existing town centre uses, only allowing a change of use where it can be demonstrated that there is a lack of demand, alternative convenience retail provision is available within 800m walking distance or the replacement land use offers benefits which outweigh the loss. As such, this has the potential to free up other land for housing where appropriate. The remaining policies are likely to generate negligible effects against this objective because they will not contribute towards housing provision.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.410** A **significant positive** effect is expected for Strategic Policies 7 (Retail and Town Centres), 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre). This is because the policies support the enhancement of the District's



most important centres. Therefore, these policies promote equality of access and opportunity to adequate provision of town centre uses. Furthermore, Strategic Policies 8, 9 and 10 encourage more measures to attract visitors through signage and events.

**7.411** Retail Policy 1 (Primary Shopping Areas), Retail Policy 2 (Sequential Test and Impact Assessment) and Retail Policy 4 (Shopfronts) are all expected to have a minor positive effect against this objective. This is because these policies protect existing shops, which generally contribute positively peoples' health and well-being.

**7.412** Retail Policy 3 (Local Shops) is expected to have a mixed minor positive and minor negative effect against this objective, as this policy promotes the protection of existing shops, but also sets out the exceptional circumstances where changes of use may be acceptable. This may result in a new loss of local services and facilities in certain parts of the District, albeit in locations where demand is lower.

### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**7.413** A minor positive effect is expected against all policies. This is because all the policies promote town centre uses, mainly retail, in centres and protect existing shop and retail units. As such, residents will be able to use shops in accessible locations, supporting the economy and shops that employ local people.

### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.414** A minor positive effect is expected against all policies except Retail Policy 4 (Shopfronts). This is because the majority of the policies help to protect accessible centres or varying scale, reducing the need for travel by private vehicle and their contribution to the congestion on the District's roads. Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) help to promote improvements to the connectivity of the centre through improved signage to the seafront. Furthermore, they encourage a balanced approach to car parking provision that acknowledges the sustainability of the town centre and its rail and bus connections.

### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.415** A minor positive effect is expected against all policies except Retail Policy 3 (Local Shops) and Retail Policy 4 (Shopfronts). This is because the majority of the policies directly encourage investment in established urban centres, helping to maximise the potential of urban accessible locations and contributing to minimising the loss of greenfield land and its natural resources. Strategic Policy 8 (Dover Town Centre) cross refers to Policy NE6 (The River Dour), emphasising the importance for development adjacent to The River Dour to improve its water quality and natural ecosystem. Strategic Policy 7 (Retail and Town Centres) prioritises the filling/ replacing and re-purposing of vacant units.

### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.416** A minor positive effect is expected against all policies except Retail Policy 4 (Shopfronts). This is because the majority of the policies help to protect accessible town centres or varying scale, reducing the need for travel by private vehicle and their contribution to the poor air quality in certain parts of the District. Furthermore, some of the policies support mixed-use development and the development of upper floors above shops into residential or office use. Town centre uses will be within walking distance for these residents. Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) also encourage a balanced approach to car parking provision that acknowledges the sustainability of the town centre and its rail and bus connections.

### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.417** A minor positive effect is expected for Strategic Policy 7 (Retail and Town Centres) as the policy promotes investment in the quality of the town centre environments to create more attractive, accessible, safe and greener environments. Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) are likely to have a minor positive effect against this objective as these policies support investment in existing and establishing new green infrastructure in the town centres. Green infrastructure can help reduce the urban heat island effect, which helps reduce the temperature in urban areas, in addition to contributing to biodiversity.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.418** A minor positive effect is expected against all policies except Retail Policy 4 (Shopfronts). This is because all the policies help to protect accessible centres of varying scale, reducing the need for travel by private vehicle and their contribution to the emission of greenhouse gases. Furthermore, the policies support mixed-use development and the development of upper floors above shops into residential or office use. Town centre uses will be within walking distance for these residents, further reducing the need to more unsustainable modes of transport. Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) also encourage a balanced approach to car parking provision that acknowledges the sustainability of the town centre and its rail and bus connections.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.419** A minor positive effect is expected for Strategic Policy 7 (Retail and Town Centres) as the policy promotes investment in the quality of the town centre environments to create more attractive, accessible, safe and greener environments. Strategic Policies 8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) are also likely to have minor positive effects against this objective as these policies support investment in existing and establishing new green infrastructure in the town centres, encouraging the protection and enhancement of the natural environment and contributing to climate change resilience.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.420** A minor positive effect is expected against all policies except Retail Policy 2 (Sequential Test and Impact Assessment) and Retail Policy 3 (Local Shops). This is because the majority of policies aim to enhance the quality of the environment in town centres, which includes their local distinctiveness and historic character. Furthermore, the policies generally recognise the rich historical landscape, ensuring proposals conserve and enhance the setting and character of important Heritage Assets, including Conservation Areas. Strategic Policy 8 (Dover Town Centre) also emphasises that particular regard should be made to the Dover Town Urban Archaeological Database once adopted. Retail Policy 4 (Shopfronts) requires proposals to consider architectural styles and materials of buildings and the character of the wider street scene when designing shop fronts. Architectural or historic shop fronts must also be kept and restored. As such, the policies have the potential to maintain and improve the District's historic environment.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.421** A minor positive effect is expected against all policies except Retail Policy 2 (Sequential Test and Impact Assessment) and Retail Policy 3 (Local Shops). This is because these policies aim to enhance the quality of the environment in town centres, including the local distinctiveness of the District's townscapes.

**7.422** The policies require all proposals to demonstrate a quality design that makes a contribution to the character of centres, including any proposed buildings and public realm. Retail Policy 4 (Shopfronts) requires proposals to keep the scale, proportion, composition, design and decorative treatment in keeping with the character and appearance of the building and wider street scene. As such, the policies will have a positive effect on the District's townscapes, as well as minimise harm to the wider open countryside by maximising the sustainable potential of urban centres.

Table 7.14: Likely effects of Publication Local Plan retail and town centre policies

Retail and Town Centre Policies / SA Objectives	Strategic Policy 7: Retail and Town Centres	Strategic Policy 8: Dover Town Centre	Strategic Policy 9: Deal Town Centre	Strategic Policy 10: Sandwich Town Centre	Retail Policy 1: Primary Shopping Areas	Retail Policy 2: Sequential Test and Impact Assessment	Retail Policy 3: Local Shops	Retail Policy 4: Shopfronts
SA1: Housing	+	+	+	+	+	0	+	0
SA2: Health and well-being	++	++	++	++	+	+	+/-	+
SA3: Employment	+	+	+	+	+	+	+	+
SA4: Transport	+	+	+	+	+	+	+	0
SA5: Resources	+	+	+	+	+	+	0	0
SA6: Air pollution	+	+	+	+	+	+	+	0
SA7: Flood risk	+	+	+	+	0	0	0	0
SA8: Climate change	+	+	+	+	+	+	+	0
SA9: Biodiversity	+	+	+	+	0	0	0	0
SA10: Historic environment	+	+	+	+	+	0	0	+
SA11: Landscape	+	+	+	+	+	0	0	+
<b>Key</b>	++ Significant positive effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		0 Negligible effect likely	

### Retail and town centre policy recommendations

**7.423** No additional recommendations on the Council's planning for retail and town centre policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**.

### Transport and Infrastructure Policies

**7.424** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define seven transport and infrastructure policies in the Publication Local Plan:

- Strategic Policy 11: Infrastructure and Developer Contributions.
- Strategic Policy 12: Strategic Transport Infrastructure.
- Transport and Infrastructure Policy 1: Sustainable Travel.
- Transport and Infrastructure Policy 2: Transport Statements, Assessments and Travel Plans.
- Transport and Infrastructure Policy 3: Parking Provision on New Development.
- Transport and Infrastructure Policy 4: Overnight Lorry Parking Facilities.
- Transport and Infrastructure Policy 5: Digital Technology.

### Reasonable alternatives SA

**7.425** A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**. Some additional options and recommendations have been assessed for the Publication version of the Plan, as set out below.

**7.426** Strategic Policy 12 (Strategic Transport Infrastructure) has been updated to apply to strategic transport infrastructure in general as opposed to focussing on solely highways infrastructure as it did in the Regulation 18 Draft Local Plan. This more general policy approach is appraised through the SA of Strategic Policy 12 (Strategic Transport Infrastructure) below.

### Parking provision on new development

**7.427** During the preparation of the Publication Local Plan, the council identified an additional option to those considered during the preparation of the Draft Local Plan:

- Support the use of Controlled Parking Zones (CPZ) for the management of on-street parking.

**7.428** This option has therefore been appraised alongside the three options considered during the preparation of the Draft Local Plan – there is now a total of four options:

- a. Use Kent County Council's maximum car parking standards (set out in SPD and Kent Design Guide Interim Note 3) as the maximum number of parking spaces permitted for both new residential and, where appropriate, non-residential developments across the District.
- b. Define local parking standards, including geographically tapered maximums for residential developments reflecting their location.
- c. Encourage residential development with no parking provision in appropriate locations.
- d. Support the use of Controlled Parking Zones (CPZ) for the management of on-street parking.

**7.429** All four options have the potential to generate **significant positive** effects against SA objective 4 (transport) by helping to discourage the use of private cars in favour of more sustainable forms of transport. However, the provision of some new car parking spaces will continue to facilitate more vehicles on roads, with minor negative effects against this SA objective. Associated minor positive and minor negative effects are recorded against SA objectives 2 (health and well-being), 6 (air pollution) and 8 (climate change) through reducing and increasing traffic flows and air pollution in the District.

**7.430** A combination of options b, c and d are likely to yield the greatest positive effects because local criteria are likely to be more tailored to the specific needs of the District, maximising the opportunities to reduce parking areas in appropriate new developments. However, the current KCC parking standards are considered to remain appropriate for the District also and therefore option a will also yield positive effects.

### **Council's reasons for selecting the preferred option**

**7.431** The Council plan to continue to rely on the County maximum standards (option a) as they are considered to remain appropriate for the district. Residential development with no parking (option c) and the use of CPZ (option d) will be supported where it supports the wider parking strategy.

### **Overnight lorry parking**

**7.432** The preparation of the Publication Local Plan resulted in the creation of a new transport and infrastructure policy: Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities). The need for such a policy was raised by Kent County Council during the consultation on the Draft Local Plan as a requirement of the NPPF. The Council considered three options for such a policy at the Publication Local Plan stage:

- a. Identifying specific site allocations for the provision of overnight lorry parking over the plan period.
- b. A criteria-based policy designed to guide the search and selection of overnight lorry parking sites over the plan period.
- c. Relying on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for new development in the District.

**7.433** The omission of a local policy on this issue (option c) in favour of relying on national planning policy and guidance would result in negligible effects against the SA objectives in the SA framework. This is because the SA baseline is already influenced by national planning policy and guidance.

### **Council's reasons for selecting preferred option**

**7.434** No suitable and deliverable overnight lorry parking sites were identified during the preparation of the Publication Local Plan and so a criteria-based policy is currently considered to be the only reasonable alternative. This policy option is appraised alongside the other transport and infrastructure policies below.

**7.435** Amendments to the remaining transport and infrastructure policies in the Publication Local Plan yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. Further justification is provided in the Publication Local Plan.

### **Transport and infrastructure policies SA**

**7.436 Table 7.15** sets out the likely effects of the Publication Local Plan transport and infrastructure policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home**

**7.437** All transport and infrastructure policies are expected to result in a mixed minor positive and minor negative effect against this objective except for Transport and Infrastructure Policy 5 (Digital Technology). This is because housing will benefit from better transport infrastructure, such as public and general road access and sustainable modes of transport. The strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against this objective, as the more developers delivering homes have to invest in infrastructure, the more this will affect the viability and therefore the delivery of new, affordable homes in the District.

**7.438** Transport and Infrastructure Policy 5 (Digital Technology) is expected to have a minor positive effect as the policy encourages investment in digital connectivity, which will improve the standard of new developments as places to live and work. Investment in this infrastructure is not considered to notably affect the viability and therefore the deliverability of new homes in the District because there is a national requirement to improve digital connectivity across the country.

#### **SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration**

**7.439** A **significant positive** effect is expected for Strategic Policy 11 (Infrastructure and Developer Contributions) and Transport and Infrastructure Policy 1 (Sustainable Transport and Travel).

**7.440** This is because these policies require development to provide key strategic infrastructure needs associated with new development, for health, education, open space and community facilities and make improvements where appropriate. The provision of this infrastructure, services and facilities will improve resident, worker and visitor physical and mental health and well-being. Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) encourages sustainable and active travel and the delivery of strategic sustainable transport schemes, which contribute to healthy lifestyles, help to minimise the number of private vehicles on the road and the air and noise pollution they create. A minor negative effect is also recorded for Strategic Policy 11 (Infrastructure and Developer Contributions) in acknowledgement of the fact that a significant proportion of infrastructure contributions will go to highways improvements, which will facilitate more private vehicles on the District's road network, which has the potential to increase road noise, light and air pollution in the District.

**7.441** A minor positive effect is recorded for Transport and Infrastructure Policy 5 (Digital Technology) against this objective because of improvements investment in the digital connectivity of homes and business will do to the health and well-being of people of all ages, making it easier for people to do their jobs and to access a broad range of educational and entertainment services.

**7.442** The remaining policies will have a mixed minor positive and minor negative effect against this objective. Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) record minor positive effects in acknowledgement of their focus on maintaining and improving accessibility across the District. The minor adverse effect is in acknowledgement of the fact that the policies cover highways improvements, which will facilitate more private vehicles on the District's road network and provide parking for HGVs, which has the potential to increase road noise, light and air pollution in the District.

### **SA 3: To deliver and maintain sustainable and diverse employment opportunities**

**7.443** All transport and infrastructure policies are expected to have a mixed minor positive and minor negative effect against this objective except for Transport and Infrastructure Policy 5 (Digital Technology).

**7.444** Strategic Policy 11 (Infrastructure and Developer Contributions), Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) and Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans) facilitate and promote investment in new transport infrastructure, making it easier for people to access their places of work and for commerce to operate effectively and efficiently across the District, most notably in and around Dover Port and the other strategic employment sites in the District. The strength and breadth of infrastructure investment requirements are equally likely to influence the likelihood for negative effects against this objective, as the more developers delivering new business premises have to invest in infrastructure, the more this may affect the viability and therefore the delivery of new, affordable business premises in the District. Therefore, minor negative effects are also recorded for the majority of the policies.

**7.445** Transport and Infrastructure Policy 5 (Digital Technology) is expected to have a minor positive effect as it requires investment in digital connectivity, improving more flexible working practices that have the potential to increase the diversity and resilience of the District's economy. Investment in this infrastructure is not considered to notably affect the viability and therefore the deliverability of new employment premises in the District because there is a national requirement to improve digital connectivity across the country.

### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.446** A **significant positive** effect is expected for Strategic Policy 11 (Infrastructure and Developer Contributions) and Strategic Policy 12 (Strategic Transport Infrastructure) and Transport and Infrastructure Policy 1 (Sustainable Travel) against this objective in acknowledgement of the fact that they encourage sustainable and active travel and a significant proportion of developer contributions will go towards the improvement of the District's transport infrastructure network and general connectivity, including active and more sustainable modes of travel. A minor negative effect is also recorded against Strategic Policy 12 (Strategic Transport Infrastructure) because the policy will generally facilitate the road travel, which has the potential to increase the number of vehicles on the road rather than exclusively encourage more sustainable modes of transport.

**7.447** Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry

Parking Facilities) are expected to have a mixed minor positive and minor negative effect against this objective. This is because these policies support improvements to the District's highway and transport infrastructure, which will help reduce traffic and congestion in the District whilst also facilitating greater vehicle travel on the wider network. The minor adverse effect is recorded for the same reason as Strategic Policy 12 (Strategic Transport Infrastructure).

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.448** A minor positive effect is recorded for Strategic Policy 11 (Infrastructure and Developer Contributions) in acknowledgement that the policy requires developer contributions for necessary infrastructure as a result of new development. This will include funding to improve the capacity and provision of water, sewage treatment and the sustainable management of waste, helping to protect and minimise the use of the District's natural resources.

**7.449** An uncertain minor negative effect is recorded for Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) to acknowledge the potential for new overnight lorry parking facilities to result in the potential loss of a notable area of the District's best and most versatile agricultural land and/or mineral resources. This effect is recorded as minor and uncertain in acknowledgement of the fact that the exact location and sensitivities of future facilities is unknown.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.450** Strategic Policy 11 (Infrastructure and Developer Contributions) and Transport and Infrastructure Policy 1 (Sustainable Travel) are expected to have a minor positive effect against this objective. Strategic Policy 11 (Infrastructure and Developer Contributions) requires developer contributions for various types of necessary infrastructure. Although some types of infrastructure are likely to facilitate increases in road vehicles, others will help to reduce congestion and associated air pollution, encourage alternative modes of the transport that minimise air pollution further or make provision for green infrastructure, which will contribute to the dispersal of air pollution, resulting in an overall net positive. Transport and Infrastructure Policy 1 (Sustainable Travel) promotes sustainable and active travel contributing to a general reduction in road congestion and heavy polluting vehicles.

**7.451** Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) are expected to have mixed minor positive and minor negative effects against this objective. This is because these policies promote highway infrastructure and on-street HGV parking, which may increase the number of vehicles on the District's roads and therefore their pollution generating potential, but they will also help to reduce congestion and associated air pollution and encourage alternative, sustainable modes of the transport that minimise air pollution further.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.452** Minor positive effects are recorded for Strategic Policy 11 (Infrastructure and Developer Contributions). This is because it requires developer contributions for various types of necessary infrastructure. Although some types of infrastructure are likely to increase the urban heat island effect in the District's urban areas, reduce greenspace and increase water consumption, it is considered that the majority of infrastructure measures will contribute to minimising urban heat generation, improving water efficiency, flood risk and urban cooling through green infrastructure provision.

**7.453** An uncertain minor negative effect is recorded for Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) to acknowledge the potential for new overnight lorry parking facilities to result in the potential loss of a notable area of permeable greenfield land contributing to flood alleviation and cooling. This effect is recorded as minor as uncertain in acknowledgement of the fact that the exact location and sensitivities of future facilities is unknown.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.454** Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) has the potential to generate a **significant positive** effect against this SA objective because it directly promotes climate change mitigation through sustainable and low carbon travel practices.

**7.455** Strategic Policy 11 (Infrastructure and Developer Contributions) is expected to have a minor positive effect against this objective. This is because Strategic Policy 11 (Infrastructure and Developer Contributions) requires developer contributions for all types of necessary infrastructure. Although some types of infrastructure are likely to facilitate increases in road vehicles, others will help to reduce congestion and associated greenhouse gas emissions, encourage alternative modes of the transport that utilise green energy or make provision for green infrastructure, which will contribute to carbon sequestration, resulting in an overall net positive.

**7.456** Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) are expected to have mixed minor positive and minor negative effects against this objective. This is because these policies promote highway infrastructure, which will increase the number of vehicles on the District's roads and therefore their pollution generating potential, but they will also help to reduce congestion and associated carbon emissions and encourage alternative modes of the transport that avoid direct emissions or minimise greenhouse gas emissions.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.457** A minor positive effect is expected for Strategic Policy 11 (Infrastructure and Developer Contributions) and Transport and Infrastructure Policy 1 (Sustainable Transport and Travel). Strategic Policy 11 (Infrastructure and Developer Contributions) requires developer contributions for various types of necessary infrastructure. Although some types of infrastructure are likely to facilitate the loss of greenspace, it is considered that the majority of infrastructure measures will contribute to maximising the potential of urban areas and therefore minimising the loss of greenfield land which is more likely to be of ecological value and, in certain locations expand, connect and improve green infrastructure provision. Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) indirectly promotes and protects biodiversity through the promotion of sustainable transport, reducing air and noise pollution.

**7.458** An uncertain minor negative effect is recorded for Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) to acknowledge the potential for new overnight lorry parking facilities to result in the potential loss of a notable area of greenfield land and ecological habitats. This effect is recorded as minor and uncertain in acknowledgement of the fact that the exact location and sensitivities of future facilities is unknown.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.459** A minor positive effect is recorded against Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) because it indirectly promotes the climate change resilience of historic assets across the District in the medium to long term through the promotion of sustainable transport and consequent reduction in greenhouse gas emissions.

**7.460** An uncertain minor negative effect is recorded for Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) to acknowledge the potential for new overnight lorry parking facilities to result in large areas of new urbanising development which may adversely affect the significance and/or setting of some of the District's historic assets. This effect is recorded as minor and uncertain in acknowledgement of the fact that the exact location and sensitivities of future facilities is unknown. Furthermore, the policy requires that substantial landscaping and screening should be provided to mitigate the visual impact of such development.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.461** A minor positive effect is expected for Strategic Policy 11 (Infrastructure and Developer Contributions) and Transport and Infrastructure Policy 1 (Sustainable Transport and Travel). Strategic Policy 11 (Infrastructure and Developer Contributions) requires developer contributions for all types of necessary infrastructure. Although some types of infrastructure are likely to facilitate the urbanisation of urban areas, it is considered that the majority of infrastructure measures will contribute to minimising the loss of greenfield land which is more likely to be of sensitive landscape value and, in certain locations expand, connect and improve green infrastructure provision, which has the potential to improve the setting and local distinctiveness of the townscapes. Transport and Infrastructure Policy 1 (Sustainable Transport and Travel) indirectly promotes the climate



change resilience of landscapes and townscapes across the District in the medium to long term through the promotion of sustainable transport and consequent reduction in greenhouse gas emissions.

**7.462** An uncertain minor negative effect is recorded for Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) to acknowledge the potential for new overnight lorry parking facilities to result in large areas of new urbanising development which may adversely affect the significance and/or setting of some of the District's sensitive landscapes and townscapes. This effect is recorded as minor and uncertain in acknowledgement of the fact that the exact location and sensitivities of future facilities is unknown. Furthermore, the policy requires that such sites must not be located within the AONB, must avoid or minimise impacts on the setting of the AONB and substantial landscaping and screening should be provided to mitigate the visual impact of such development.

Table 7.15: Likely effects of Publication Local Plan transport and infrastructure policies

Transport and Infrastructure Policies / SA Objectives	Strategic Policy 11: Infrastructure and Developer Contributions	Strategic Policy 12: Strategic Transport Infrastructure	Transport and Infrastructure Policy 1: Sustainable Transport and Travel	Transport and Infrastructure Policy 2: Transport Statements, Assessments and Travel Plans	Transport and Infrastructure Policy 3: Parking Provision on New Development	Transport and Infrastructure Policy 4: Overnight Lorry Parking Facilities	Transport and Infrastructure Policy 5: Digital Technology
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+
SA2: Health and well-being	++/-	+/-	++	+/-	+/-	+/-	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+
SA4: Transport	++	++/-	++	+/-	+/-	+/-	0
SA5: Resources	+	0	0	0	0	-?	0
SA6: Air pollution	+	+/-	+	+/-	+/-	+/-	0
SA7: Flood risk	+	0	0	0	0	-?	0
SA8: Climate change	+	+/-	++	+/-	+/-	+/-	0
SA9: Biodiversity	+	0	+	0	0	-?	0
SA10: Historic environment	0	0	+	0	0	-?	0
SA11: Landscape	+	0	+	0	0	-?	0
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+	Minor positive effect likely	+/- Mixed minor effect likely	- Minor negative effect likely	0 Negligible effect likely

### Transport and infrastructure policy recommendations

**7.463** The SA generally finds the transport and infrastructure policies of the Publication Local Plan to deliver positive effects, including **significant positive** effects against SA objectives **2 (health and well-being)** and **4 (transport)**.

**7.464** The Council considered strengthening the wording for Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans) and Transport and Infrastructure Policy 3 (Parking Provision on New Development) to prioritise sustainable modes of transport before investment in highway infrastructure, to help offset the potential for adverse effects associated with facilitating more private vehicles on the District's road network, and the associated adverse effects against SA objectives 6 (air pollution) and 8 (climate change). It was concluded that policies in other chapters of the Publication Local Plan help to avoid and mitigate these potential negative effects. **Table 7.15** names the other policies that are likely to help in this regard.

### Natural Environment Policies

**7.465** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define eight natural environment policies in the Publication Local Plan:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.
- Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.
- Natural Environment Policy 4: Air Quality.
- Natural Environment Policy 5: Water Supply and Quality.
- Natural Environment Policy 6: The River Dour.

### Reasonable alternatives SA

**7.466** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. Further justification is provided in the Publication Local Plan.

### Natural environment policies SA

**7.467 Table 7.16** sets out the likely effects of the Publication Local Plan natural environment policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.468** The natural environment policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies help protect and enhance the District's natural environment, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the affordability of homes and/or their viability over the Plan period, with minor negative effects against this SA objective.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.469** All the natural environment policies have the potential to generate minor positive effects against this SA objective.

**7.470** Their focus on protecting, connecting and enhancing the local natural environment has direct and indirect benefit for the District's residents, workers and visitors, for example mitigating the adverse effects of climate change and facilitating physical and mental well-being. For example, improving the District's green infrastructure network will also contribute to mitigating air and water pollution, cool urban areas and connecting people to nature.

### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.471** The natural environment policies all have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies help protect and enhance the District's natural environment, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the profitability of new business investments and premises and therefore their viability over the Plan period, with minor negative effects against this objective.

### SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

**7.472** Natural Environment Policy 4 (Air Quality) is expected to generate a minor positive effect against this SA objective. This is because the policy requires major development to demonstrate a shift to the use of sustainable low emission transport, contributing to reducing the need for private car use and helping to reduce road congestion.

### SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters

**7.473** Natural Environment Policy 5 (Water Quality and Supply) is expected to have a **significant positive** effect against this objective as it aims to protect water quality in the District's water bodies and courses. Furthermore, the policy requires development to minimise water use. The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.
- Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.
- Natural Environment Policy 6: The River Dour.

**7.474** This is because these policies are focussed on the enhancement of the District's natural environments, including the natural ecosystem services they provide. Although one of the key focusses of Natural Environment Policy 6 (The River Dour) is the protection of the water quality of The River Dour and its associated natural resources, its focus on a specific area restricts its influence to a smaller area in the District. Therefore, its effects are also considered to minor positive against this SA objective overall.

### SA 6: To reduce air pollution and ensure air quality continues to improve

**7.475** Natural Environment Policy 4 (Air Quality) is expected to have a **significant positive** effect against this objective.

**7.476** This is because this policy encourages development be located near public transport or where walking and cycling is possible. Development that might lead to significant deterioration in air quality or where national air quality objectives may be exceeded will require an Air Quality Assessment, helping to minimise and mitigate the effects of poor air quality.

### SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change

**7.477** Natural Environment Policy 5 (Water Quality and Supply) is expected to have a **significant positive** effect against this objective, as it aims to minimise water use in future developments and protect water resources, such as Groundwater Protection Zones. The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.
- Natural Environment Policy 6: The River Dour.

**7.478** This is because these policies directly promote climate change adaptation through sustainable design and investment in green infrastructure, which will contribute to the climate change resilience of the District's natural environments and urban areas.

Although one of the key focusses of Natural Environment Policy 6 (The River Dour) is to maintain river flow and capacity, its focus on a specific area restricts its influence to a smaller area. Therefore, its effects are also considered to minor positive against this SA objective overall.

#### SA 8: To mitigate climate change by actively reducing greenhouse gas emissions

**7.479** The following natural environment policies have the potential to generate minor positive effects against this SA objective:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.
- Natural Environment Policy 4: Air Quality.

**7.480** This is because these policies directly promote climate change mitigation either through encouraging low emission lifestyles or carbon sequestration through the enhancement of the District's green infrastructure network.

#### SA 9: To conserve, connect and enhance the District's wildlife habitats and species

**7.481** The following natural environment policies have the potential to generate **significant positive** effects against this SA objective by virtue of the fact they are focussed on the protection and enhancement of the District's wildlife assets and sensitive areas:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.

**7.482** A minor negative effect is also recorded against this SA objective for Strategic Policy 13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets). This is because the policy sets out the scenarios in which adverse effects on international, national and local biodiversity assets may be permitted, albeit in relatively rare occasions and all development proposals affecting designated sites must demonstrate that the mitigation hierarchy has been followed, including appropriate project design, and evidence of adequate avoidance and mitigation measures.

**7.483** The remaining natural environment policies have the potential to generate minor positive effects against this SA objective:

- Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.
- Natural Environment Policy 4: Air Quality.
- Natural Environment Policy 5: Water Quality and Supply.
- Natural Environment Policy 6: The River Dour.

**7.484** This is because Natural Environment Policy 2 (Landscape Character and the Kent Downs AONB) promotes the protection and enhancement of landscape character, which includes wildlife habitats, trees and woodland. Natural Environment Policy 5 (Water Quality and Supply) and Natural Environment Policy 6 (The River Dour) aim to protect local water bodies and courses which make a significant contribution to the quality and diversity of the District's wildlife habitats. Natural Environment Policy 4 (Air Quality) helps to avoid and minimise the deterioration of the District's air quality and its adverse effects on the District's biodiversity assets.

#### SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment

**7.485** Strategic Policy 13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets) and Natural Environment Policy 2 (Landscape Character and the Kent Downs AONB) are expected to have a minor positive effect against this SA objective. Both policies require the protection of the District's historic natural landscapes and seascapes, such as the Heritage Coasts and the Kent Downs AONB.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.486** Natural Environment Policy 2 (Landscape Character and the Kent Downs AONB) has the potential to generate **significant positive** effects against this SA objective because it focusses on the protection and enhancement of the District's natural and historic landscape and townscape character and in particular the Kent Downs AONB and Heritage Coasts.

**7.487** Other natural environment policies have the potential to generate more minor positive effects against this SA objective:

- Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.
- Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.
- Natural Environment Policy 1: Biodiversity Net Gain.
- Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA.
- Natural Environment Policy 5: Water Quality and Supply.
- Natural Environment Policy 6: The River Dour.

**7.488** This is because these policies promote the protection and enhancement of the District's natural land and waterscapes, as well as the protection of designated sites and green infrastructure which contribute to them.

Table 7.16: Likely effects of Publication Local Plan natural environment policies

Natural Environment Policies / SA Objectives	Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets	Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity	Natural Environment Policy 1: Biodiversity Net Gain	Natural Environment Policy 2: Landscape Character and the Kent Downs AONB	Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy	Natural Environment Policy 4: Air Quality	Natural Environment Policy 5: Water Quality and Supply	Natural Environment Policy 6: The River Dour
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and well-being	+	+	+	+	+	+	+	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Transport	0	0	0	0	0	+	0	0
SA5: Resources	+	+	+	+	+	0	++	+
SA6: Air pollution	0	0	0	0	0	++	0	0
SA7: Flood risk	+	+	+	+	0	0	++	+
SA8: Climate change	+	+	+	+	0	+	0	0
SA9: Biodiversity	++/-	++	++	+	++	+	+	+
SA10: Historic environment	+	0	0	+	0	0	0	0
SA11: Landscape	+	+	+	++	+	0	+	+
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely		+ Minor positive effect likely		+/- Mixed minor effect likely		0 Negligible effect likely

### Natural environment policy recommendations

**7.489** The SA generally finds the natural environment policies of the Publication Local Plan to deliver positive effects, including **significant positive** effects against SA objectives **4 (resources)**, **5 (air pollution)**, **7 (flood risk)**, **9 (biodiversity)** and **11 (landscape)**.

**7.490** No additional recommendations on the Council's natural environment policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**.

### Historic Environment Policies

**7.491** The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define five historic environment policies in the Publication Local Plan:

- Strategic Policy 15: Protecting the District's Historic Environment.
- Historic Environment Policy 1: Designated and Non Designated Heritage Assets.
- Historic Environment Policy 2: Conservation Areas.
- Historic Environment Policy 3: Archaeology.
- Historic Environment Policy 4: Historic Parks and Gardens.

### Reasonable alternatives SA

**7.492** The preparation of these Publication Local Plan policies yielded no additional reasonable alternatives to those identified and appraised in **Chapter 6**. The justification for the selection of these final policies remains the same as the justification given for the relevant preferred policies in **Chapter 6**. Further justification is provided in the Publication Local Plan.

### Historic environment policies SA

**7.493 Table 7.17** sets out the likely effects of the Publication Local Plan historic environment policies. The reasoning for the identification of these likely effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.494** Strategic Policy 15 (Protecting the District's Historic Environment), Historic Environment Policy 1 (Designated and Non-designated Heritage Assets), Historic Environment Policy 2 (Conservation Areas) and Historic Environment Policy 4 (Historic Parks and Gardens) have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies' help protect and enhance the local character and distinctiveness of the District, maintaining it as a nice place to live, work and visit. However, delivering these local requirements has the potential to reduce the affordability of homes and/or their viability over the Plan period, with minor negative effects against this SA objective. A minor negative effect is recorded against Historic Environment Policy 3 (Archaeology) for the same reason.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.495** All historic environment policies have the potential to generate a minor positive effect against this SA objective by virtue of the fact that they all promote the protection, enhancement and accessibility of the District's historic environment, contributing to the education, enjoyment and general well-being of local residents, workers and visitors.

#### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.496** Strategic Policy 15 (Protecting the District's Historic Environment), Historic Environment Policy 1 (Designated and Non-designated Heritage Assets), Historic Environment Policy 2 (Conservation Areas) and Historic Environment Policy 4 (Historic Parks and Gardens) have the potential to generate mixed minor positive and minor negative effects against this SA objective. The minor positive effects acknowledge how the policies help protect and enhance the local character and distinctiveness of the District, maintaining it as a nice place to live, work and visit.

**7.497** Historic Environment Policy 3 (Archaeology) requires archaeological works where important or potentially significant archaeological heritage assets may exist and for the findings to be published and achieved where development proposals affect



non-designated heritage assets with an archaeological interest. However, lengthy investigations have the potential to reduce the viability and deliverability of developments over the Plan period, with minor negative effects against this objective.

**SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.498** Historic Environment Policy 2 (Conservation Areas) has the potential to generate minor positive effects against this SA objective. Historic Environment Policy 2 (Conservation Areas) discourages unacceptable levels of traffic or parking in Conservation Areas, contributing to a reduction in the number of private vehicles in the District's historic settlements.

**SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.499** All historic environment policies are expected to have a negligible effect against this objective.

**SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.500** Historic Environment Policy 2 (Conservation Areas) has the potential to generate minor positive effects against this objective. Historic Environment Policy 2 (Conservation Areas) discourages unacceptable levels of traffic or parking in Conservation Areas, contributing to a reduction in the number of private vehicles in the District's historic settlements.

**SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.501** All historic environment policies are expected to have a negligible effect against this objective.

**SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.502** Historic Environment Policy 1 (Designated and Non-designated Heritage Assets) is expected to have a minor positive effect against this SA objective because it promotes the sensitive energy efficiency improvements to historic assets and buildings using a whole building approach, including an assessment of the suitability of the proposed measures based on the construction history of the property and its heritage significance.

**SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.503** All but one of the historic environment policies are expected to have a minor positive effect against this SA objective because they generally encourage the protection and enhancement of the natural environment as it relates to the setting, significance and resilience of the District's historic environment.

**7.504** The notable exception is Historic Environment Policy 3 (Archaeology) which is generally concerned with below ground and water historic assets. A negligible effect is therefore recorded for this policy.

**SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.505** All historic environment policies are expected to have a **significant positive** effect against this objective. This is because the policies are focussed on the conservation, excavation, recording, interpretation, promotion and enhancement of the District's historic environments and assets. A minor negative effect is also recorded against this SA objective for Historic Environment Policy 1 (Designated and Non Designated Heritage Assets). This is because the policy sets when loss of or substantial harm to the significance of designated heritage assets may be permitted.

**SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.506** All of the historic environment policies are expected to have a **significant positive** effect against this SA objective because they generally promote conservation and enhancement of historic environments and the restoration of the District's heritage assets, which will directly help protect and enhance the District's landscapes and townscapes.

Table 7.17: Likely effects of Publication Local Plan historic environment policies

Historic Environment Policies / SA Objectives	Strategic Policy 15: Protecting the District's Historic Environment	Historic Environment Policy 1: Designated and Non-designated Heritage Assets	Historic Environment Policy 2: Conservation Areas	Historic Environment Policy 3: Archaeology	Historic Environment Policy 4: Historic Parks and Gardens	
SA1: Housing	+/-	+/-	+/-	-	+/-	
SA2: Health and well-being	+	+	+	+	+	
SA3: Employment	+/-	+/-	+/-	-	+/-	
SA4: Transport	0	0	+	0	0	
SA5: Resources	0	0	0	0	0	
SA6: Air pollution	0	0	+	0	0	
SA7: Flood risk	0	0	0	0	0	
SA8: Climate change	0	+	0	0	0	
SA9: Biodiversity	+	+	+	0	+	
SA10: Historic environment	++	++/-	++	++	++	
SA11: Landscape	++	++	++	++	++	
<b>Key</b>	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+ Minor positive effect likely	+/- Mixed minor effect likely	- Minor negative effect likely	0 Negligible effect likely

### Historic environment policy recommendations

**7.507** The SA generally finds the historic environment policies of the Publication Local Plan to deliver positive effects, including **significant positive** effects against SA objectives **10 (historic environment)** and **11 (landscape)**.

**7.508** No additional recommendations on the Council's historic environment policies were made during the SA of the Publication Local Plan. A record of SA recommendations made during the preparation of the Draft Local Plan can be found in **Chapter 6**.

### Mitigation

**7.509** It is a requirement of the SEA Regulations that consideration be given to “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”.

**7.510 Table 7.18** summarises the negative effects that could arise from the implementation of the individual Publication Local Plan policies in relation to each SA objective and how these are likely to be mitigated by other policies in the Publication Local Plan.

Table 7.18: Potential negative effects of Publication Local Plan policies and potential mitigation measures of other Publication Local Plan policies

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
SA1: Housing	<p>The policy requirements set out in all the climate change policies, healthy and inclusive communities policies, natural environment policies, historic environment policies and all but one of the transport and infrastructure policies could generate minor negative effects against this SA objective because delivering these local requirements has the potential to reduce the affordability of homes and/or their viability over the Plan period, which may impact the ability of the District to meet its housing needs in a timely manner.</p> <p>New home policies, specifically Strategic Policy 5 (Affordable Housing) and Housing Policy 5 (Self-build and Custom Housebuilding) have the potential to generate <b>significant negative</b> and minor negative effects against this SA objective, respectively. The former because the policy does not require developments delivering new homes in the District's regional centre of Dover to provide any affordable housing, and the latter because the policy does not specify the specific type and locations such housing will be delivered, making it less likely such housing will be delivered within the Plan period.</p>	<p>No single policy in the Publication Local Plan actively mitigates the effects of its requirements on the deliverability of the Local Plan to meet the economic and residential growth needs and aspirations of the District; however, the Publication Local Plan will be supported by an appropriate delivery strategy.</p> <p>The District's Whole Plan Viability Study (2020) concludes that all typologies of affordable housing in Dover are shown to be unviable, as a result of the allocated sites being located on previously developed land generating higher development costs and contingencies and the lower value of homes in the town. Therefore, the significant negative effect recorded against this SA objective cannot be reasonably mitigated.</p>
SA2: Health and well-being	<p>New homes policies, namely Strategic Policies 3 (Housing Growth) and 5 (Affordable Housing), and Housing Policy 5 (Self-build and Custom Housebuilding), have the potential to generate minor negative effects against this SA objective. These effects acknowledge that hundreds of homes will be located in notably rural locations far from accessible essential local services and facilities. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policies' focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available.</p> <p>Several of the sites are located within the immediate vicinity of busy roads and/or railway lines, the noise impacts from which will need to be adequately minimised.</p> <p>Site allocation policies in Dover expected to have <b>significant negative</b> effects are 3 (18 – Dover Waterfront (employment) and DOV017r (residential)), 6 (21 MidTown_r – DOV018 (employment) and DOV018r (residential)), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)), 8 (DOV022B), 10 (DOV023) and 12 (DOV028). Site allocation policies in Dover expected to have minor negative effects are 1 (WHI001r and WHI008) and 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030). Site allocation policies in Deal expected to have minor negative effects are 14 (DEA008), 15 (WAL002) and 16 (GTM003, TC4S008, TC4S032 and TC4S047). One site allocation policy in Sandwich, 22 (SAN019r), is likely to have minor negative effects, whilst one in Aylesham, 26 (14 – Land off Holt Street), is likely to have <b>significant negative</b> effects. All local centre site allocation policies with the exception of 29 (EYT008), 31 (TC4S076) and 41 (WIN0014) are likely to have minor negative effects. Site Allocation Policies 31 (TC4S076) and 41 (WIN0014) are expected to have <b>significant negative</b> effects. All larger village site allocation policies with the exception of 47 (LYD003r) are likely to have minor negative effects. All but one of the smaller village and hamlet site allocations policies are expected to have minor negative effects, whilst the other, Site Allocation Policy 53 (RIN002 and RIN004), is expected to have a <b>significant negative</b> effect. One site allocation policy, 41 (WIN014), is located in relatively close proximity to a local sewage treatment works, resulting in the potential need to implement measures to reduce the adverse effects of the odours emanating from the works.</p> <p>One of the employment and local economy policies, Strategic Policy 6 (Economic Growth), has the potential to generate minor negative effects against this SA objective. This is because the intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more noise, air and light pollution, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Publication Local Plan's economic strategy generally focussing on areas of existing activity where effects are already occurring. Retail Policy 3 (Local Shops) has the potential to generate a minor negative effect against this SA objective because the policy sets out the exceptional circumstances where a change of use may be acceptable. This may result in a new loss of local services and facilities in certain parts of the District, albeit in locations where demand is lower.</p> <p>Transport and infrastructure policies, specifically Strategic Policy 12 (Strategic Transport Infrastructure), Strategic Policy 11 (Infrastructure and Developer Contributions), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development), Transport and Infrastructure and Policy 4 (Overnight Lorry Parking Facilities) have the potential to generate minor negative effects against this SA objective. This is because of the fact that these policies focus on</p>	<p>The following policies should help to ensure impacts of the new homes policies, site allocation policies, and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 1: Reducing Carbon Emissions.</li> <li>■ Climate Change 2: Sustainable Design and Construction.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 2: Sequential Test and Impact Assessment.</li> <li>■ Retail Policy 4: Shopfronts.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Strategic Policy 12: Strategic Transport Infrastructure.</li> <li>■ Transport and Infrastructure Policy 2: Transport Statements, Assessments and Travel Plans.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 4: Sports Provision.</li> <li>■ Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.</li> <li>■ Place Making Policy 6: Community Facilities and Services</li> <li>■ Transport and Infrastructure Policy 5: Digital Technology.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design, Place Making and the provision of Design Codes.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> <li>■ Natural Environment Policy 5: Water Quality and Supply.</li> </ul> <p>Furthermore, the adopted Whitfield Masterplan which is in the process of being updated aims to limit the density of homes within the immediate vicinity of the roads and plant trees along the road edges to screen and soften the noise impacts.</p>

<sup>53</sup> The negative effects identified in the SA of the Publication Local Plan Vision and Strategic Objectives are not repeated in this section. This is because the policies in the Publication Local Plan set out the means of achieving the Vision and Strategic Objectives within the Plan period. Therefore, coverage of the ways the negative effects of the policies can be mitigated also covers the opportunities to mitigate the potential negative effects of the Vision and Strategic Objectives.

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>highways improvements, which will facilitate more private vehicles on the District's road network, which has the potential to increase road noise, light and air pollution in the District.</p> <p>Place Making Policy 5 (Protection of Open Space, Sport Facilities and Local Green Space) also has the potential to generate a minor negative effect on this SA objective because it sets out the circumstances in which open space may be lost, offering scope for open space loss in certain parts of the District.</p>	<p>The following policies should help to ensure impacts of Retail Policy 3 (Local Shops) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 2: Sequential Test and Impact Assessment.</li> <li>■ Retail Policy 4: Shopfronts.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Transport and Infrastructure Policy 5: Digital Technology.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design,, Placemaking and the provision of Design Codes.</li> <li>■ Place Making Policy: Quality of Residential Accommodation.</li> </ul> <p>The following policies should help to ensure impacts of Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 4: Sports Provision.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> </ul> <p>The following policies should help to ensure impacts of some of the transport and infrastructure policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design,Placemaking and the provision of Design Codes.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> <li>■ Natural Environment Policy 5: Water Quality and Supply.</li> </ul>
SA3: Employment	<p>The policy requirements set out in all the climate change policies, healthy and inclusive communities policies, natural environment policies and historic environment policies could generate minor negative effects against this SA objective because delivering these local requirements has the potential to reduce viability and deliverability of developments over the Plan period, which may impact the ability of the District to meet its employment needs in a timely manner.</p> <p>New homes Strategic Policy 3 (Housing Growth) has the potential to generate minor negative effects against this SA objective. This is in acknowledgement of the fact that hundreds of homes will be located in notably rural locations far from accessible employment opportunities. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available.</p> <p>Some site allocations policies will have minor negative effects on this SA objective. These are Site Allocation Policies 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and 5 (TC4S092) in Dover, and all allocations relating to the larger villages and smaller villages and hamlets. This is due to the fact that although both site allocations in Dover seek to enhance the economic well-being of the town,</p>	<p>No single policy in the Publication Local Plan actively mitigates the effects of its requirements on the deliverability of the Local Plan to meet the economic and residential growth needs and aspirations of the District; however, the Publication Local Plan will be supported by an appropriate delivery strategy.</p> <p>The following policies should help to ensure impacts of the new home Strategic Policy 3 (Housing Growth) and site allocations within Dover and the larger and smaller villages, on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 1: Reducing Carbon Emissions.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Strategic Policy 6: Economic Growth.</li> <li>■ Employment Policy 3: Businesses Operating from a Residential Property.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>could also reduce profitability of new business investments and premises and their overall viability. Although the larger villages and small villages and hamlets will create construction jobs, they are located in relatively remote locations and farther from job opportunities.</p> <p>Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises) sets out the scenarios in which employment land can be replaced, increasing the likelihood of the loss of economic opportunities in limited scenarios in the District.</p> <p>All transport and infrastructure policies except Transport and Infrastructure Policy 5 (Digital Technology) are expected to have minor negative effects in relation to this SA objective, as infrastructure investment requirements may affect the viability and therefore the delivery of new, affordable business premises in the District.</p>	<ul style="list-style-type: none"> <li>■ Retail Policy 3: Local Shops.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Strategic Policy 12: Strategic Transport Infrastructure.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Transport and Infrastructure Policy 5: Digital Technology.</li> </ul> <p>All the other employment and local economy policies in the Publication Local Plan should help to ensure impacts of Employment Policy 2 (Loss or Redevelopment of Employment Sites and Premises) on this SA objective are effectively managed through the Plan period, in addition to the climate change policies, healthy and inclusive communities policies, natural environment policies, historic environment policies and transport and infrastructure policies.</p>
SA4: Transport	<p>Climate Change Policy 3 (Renewable and Low Carbon Energy Development) has the potential to generate a minor negative effect against this SA objective because the potential significant levels of construction traffic such schemes could have in potentially remote locations where there is more limited capacity on the highway network.</p> <p>New homes Strategic Policy 3 (Housing Growth), Strategic Policy 4 (Residential Windfall Development), Housing Policy 2 (Rural Local Needs Housing), Housing Policy H4 (Gypsy and Traveller Windfall Accommodation) and Housing Policy 7 (Houses in Multiple Occupation) have the potential to generate minor negative effects against this SA objective. These effects acknowledge that hundreds of homes will be located in notably rural locations where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the need for travel by private vehicles, increasing the potential for congestion at peak times. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policies' focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available. Housing Policy 7 (Houses in Multiple Occupation) prohibits unacceptably harmful impacts on highway safety and increases in on street parking, implying that some adverse effects may be acceptable.</p> <p>Some site allocations policies will have negative effects on this SA objective. Site allocation policies in Dover expected to have minor negative effects are 1 (WHI001r and WHI008) and 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), while site allocation policies in Deal expected to have minor negative effects are 14 (DEA008), 15 (WAL002) and 16 (GTM003, TC4S008, TC4S032 and TC4S047). Only Site Allocation Policy 23 (SAN019r) in Sandwich and Site Allocation Policy 26 (14 – Land off Holt Street) in Aylesham will have a minor negative effect. However, all policies with the exception of 29 (I008), 36 (SHE004r2 and TC4S082) and 37 (SHE006 and SHE008) in the local centres will have minor negative effects. Likewise, all policies except 47 (LYD003r) in the larger and smaller villages will have minor negative effects. This is because these site allocations have fairly poor access to local services and facilities, in addition to sustainable transport options.</p> <p>Employment and local economy policies, specifically Strategic Policy 6 (Economic Growth) and Employment Policy 1 (New Employment Development) have the potential to generate minor negative effects against this SA objective. This is because the intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Publication Local Plan's economic strategy generally focussing on areas of existing activity where effects are already occurring. Furthermore, Employment Policy 1 (New Employment Development) requires rural employment developments to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of some adverse effects on the highway network.</p> <p>Transport and infrastructure policies, namely Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development), and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) have the potential to generate minor negative effects against this SA objective. This because of the fact that these policies focus on highways improvements, which will facilitate more private vehicles on the District's road network, which has the potential to increase road congestion.</p>	<p>The following policies should help to ensure impacts of Climate Change Policy 3 (Renewable and Low Carbon Energy Development) and the relevant new home, allocation, employment and local economy and transport and infrastructure policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 2: Sequential Test and Impact Assessment.</li> <li>■ Retail Policy 3: Local Shops.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
SA5: Resources	<p>Climate Change Policy 3 (Renewable and Low Carbon Energy Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) have the potential to result in minor adverse effects on this SA objective by virtue of the fact that energy projects and lorry parking facilities, respectively, may often be located on greenfield land, resulting in the loss of its other ecosystem services.</p> <p>New homes Strategic Policy 3 (Housing Growth) is likely to result in a <b>significant negative</b> effect on this SA objective. This is in acknowledgement of the fact that the delivery of such a significant number of homes will result in the loss of large areas of greenfield land, including large areas of agricultural land considered to be some of the District's, indeed the country's, best and most versatile agricultural land. Furthermore, a significant proportion of the housing allocations sit within areas safeguarded for future minerals extraction. The allocations' development through the Plan period will result in the loss of these valuable and irreplaceable natural resources. Strategic Policy 4: Residential Windfall Development is likely to result in a minor negative effect on this SA objective, as it requires windfall development to not result in the significant loss of best and most versatile agricultural land, leaving scope for some adverse effects.</p> <p>All site allocation policies are likely to have a minor or <b>significant negative</b> effects in relation to natural resources, with the exception of Site Allocation Policies 4 (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)) and 8 (DOV022B) in Dover, 18 (SAN006) and 20 (SAN008) in Sandwich, and 34 (KIN002) and 35 (TC4S074) relating to local centres. <b>Significant negative</b> effects are expected for Site Allocation Policies 1 (WHI001r and WHI008), 2 (7 – White Cliffs Business Park_r3), 5 (TC4S092), 11 (DOV026r), 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), 14 (DEA008), 16 (GTM003, TC4S008, TC4S032 and TC4S047), 17 (SAN004), 19 (SAN007), 21 (SAN013), 22 (SAN023), 23 (SAN019r), 24 (AYL003r2), 25 (4 – Aylesham Development Area), 26 (14 – Land off Holt Street), 27 (AYL001), 28 (AYT003, I009 aIEYT012), 31 (TC4S076), 33 (EAS009 and TC4S023), 37 (SHE006 and SHE008), 38 (STM003), 39 (STM007 and STM008), 40 (STM006 and STM010), 41 (WIN0014), 42 (WIN003 and WIN004), 43 (ALK003), 44 (CAP006r), 45 (CAP009, CAP011 and CAP013), 46 (LAN003), 47 (LYD003r), 48 (PRE003, PRE016 and PRE017), 49 (WOR006 and WOR009), 50 (GOO006), 52 (NON006r), 53 (RIN002 and RIN004), 54 (STA004) and 55 (WOO005 and WOO006). Minor negative effects are expected for Site Allocation Policies 3 (18 – Dover Waterfront_r (employment) and DOV017r (residential)), 6 (21 MidTown_r – DOV018 (employment) and DOV018r (residential)), 9 (DOV022E), 10 (DOV023), 12 (DOV028), 15 (WAL002), 29 (EYT008), 30 (TC4S039r), 32 (EAS002), 36 (SHE004r2 and TC4S082) and 51 (SHE013). This is because the development of these site allocations will result in the loss of valuable and irreplaceable natural resources.</p> <p>Employment and local economy Strategic Policy 6 (Economic Growth) is expected to have a <b>significant negative</b> effect against this objective, while Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) have the potential to generate minor negative effects against this SA objective. This is because the policies facilitate the development of new employment and tourism attractions that have the potential to be developed on greenfield land, where there is greater scope to lose natural resources.</p>	<p>The following policies should help to ensure impacts of Climate Change Policy 3 (Renewable and Low Carbon Energy Development), Transport and Infrastructure Policy 4, the new homes policies, site allocation policies, and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Climate Change Policy 4: Water Efficiency.</li> <li>■ Climate Change Policy 5: Flood Risk.</li> <li>■ Climate Change Policy 6: Surface Water Management.</li> <li>■ Climate Change Policy 7: Coastal Change Management Areas.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 1: Biodiversity Net Gain.</li> <li>■ Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.</li> <li>■ Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> <li>■ Natural Environment Policy 5: Water Quality and Supply.</li> </ul> <p>However, beyond minimising the development of greenfield land as much as possible, the physical loss of greenfield land recognised as having agricultural or mineral value cannot be mitigated further.</p>
SA6: Air pollution	<p>New homes Strategic Policy 3 (Housing Growth) has the potential to generate a minor negative effect against this SA objective. This is because hundreds of homes will be located in notably rural locations where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the need for travel by private vehicles, increasing the potential for congestion and concentrations of air pollution at peak times, including in and around sites identified in the Air Quality Study as likely to lower air quality. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Air Quality Study's conclusion that adverse effects would be limited to slight and moderate effects and the fact that the policies generally focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available.</p> <p>Employment and local economy Strategic Policy 6 (Economic Growth) has the potential to generate a minor negative effect against this SA objective by virtue of the fact that the economic growth strategy focusses future economic growth in the District's existing operation employment sites, some of which are in close proximity to existing Air Quality Management Areas (AQMAs). Intensification, diversification and expansion of the District's economy is likely to create more traffic and activity with the potential to generate more congestion, resulting in the potential for some adverse effects against this SA objective. Likewise, Employment Policy 4 (Tourism Accommodation and Attractions) is expected to have a minor negative effect against this objective because while requiring development to demonstrate that it will not generate traffic that would be inappropriate to the rural road network, reducing the likelihood of congestion, it may also result in an increase in cars on the road, resulting in</p>	<p>The following policies should help to ensure impacts of the new homes policies, employment and local economy policies, site allocations and transport and infrastructure policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 1: Reducing Carbon Emissions.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 2: Sequential Test and Impact Assessment.</li> <li>■ Retail Policy 3: Local Shops.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>more road-based air pollution. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policy's aim to upgrade critical infrastructure and focussing on central locations.</p> <p>Employment Policy 1 (New Employment Development) has the potential to generate minor negative effects against this SA objective. This is because these policies require development to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. While this does eliminate the potential for significant congestion issues being generated, it does not eliminate the possibility of increasing the number of cars on the District's roads, resulting in the potential for more road-based air pollution.</p> <p>Some site allocation policies will have negative effects on this SA objective. Site allocation policies in Dover expected to have minor negative effects are 1 (WHI001r and WHI008), 3 (18 – Dover Waterfront_r (employment) and DOV017r (residential)), 6 (21 Dover Mid-Town - DOV018 (employment) and DOV018r Mid Town (residential)), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) and 10 (DOV023). In addition, all site allocation policies relating to larger villages and smaller villages and hamlets are likely to have minor negative effects. This is because these sites have been identified in the Council's Air Quality Study as contributing towards air pollution or are located in relatively remote locations where accessibility to local services, facilities and jobs are less readily available.</p> <p>Transport and infrastructure policies, namely Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) have the potential to generate minor negative effects against this SA objective. This is because these policies promote highway infrastructure, which will increase the number of vehicles on the District's roads and therefore their pollution generating potential.</p> <p>Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) has the potential to generate a minor negative effect against this SA objective in acknowledgement of the fact that the policy sets out the circumstances in which open spaces, which play an important role in air pollution dispersal in urban areas, may be lost for development.</p>	<ul style="list-style-type: none"> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 1: Biodiversity Net Gain.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> </ul> <p>The following policies should help to ensure impacts of Place Making Policy 5 (Protection of Open Spaces and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> </ul>
SA7: Flood risk	<p>New homes Strategic Policy 3 (Housing Growth) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) have the potential to generate minor adverse effects against this SA objective. This is in acknowledgement of the fact that the delivery of such a significant number of homes and a potential large lorry park will result in the loss of large areas of greenfield land and vegetation performing an important cooling and water sequestration role. The loss of this land to development will generally increase the likelihood of surface water flooding and extreme heat in the developed parts of the District. Furthermore, a significant proportion of the site allocations are located on land with the potential for surface water flooding.</p> <p>Many site allocations policies are likely to have negative effects on this SA objective. Site allocation policies in Dover, namely 2 (7 – White Cliffs Business Park r3) and 11 (DOV026r), are expected to have <b>significant negative</b> effects, whilst minor negative effects are expected for Site Allocation Policies 1 (WHI001r and WHI008), 3 (18 – Dover Waterfront_r (employment) and DOV017r (residential)), 5 (TC4S092), 6 (21 MidTown_r – DOV018 (employment) and DOV018r Mid Town (residential)), 8 (DOV022B), 9 (DOV022E), 10 (DOV023), 12 (DOV028) and 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030). Site Allocation Policies 15 (WAL002) and 16 (GTM003, TC4S008, TC4S032 and TC4S047) in Deal are expected to have minor negative effects, along with all site allocation policies in Sandwich with the exception of Site Allocation Policy 23 (SAN019r). Likewise, Site Allocation Policies 24 (AYL003r2) and 26 (14 – Land off Holt Street) in Aylesham are likely to have minor negative effects, along with Site Allocation Policies 28 (yet003, YET009 ayetEYT012), 33 (EAS009 and TC4S023) and 37 (SHE006 and SHE008) in the local centres. Site Allocation Policies 48 (PRE003, PRE016 and PRE017) and 50 (GOO006) in the larger and smaller villages are expected to have <b>significant negative</b> effects, while Site Allocation Policies 43 (ALK003), 45 (CAP009, CAP011 and CAP013), 47 (LYD003r) and 48 (WOR006 and WOR009) in the larger and smaller villages are expected to have minor negative effects.</p> <p>Employment and economic growth policy Strategic Policy 6 (Economic Growth) has the potential to generate minor adverse effects against this SA objective. This is because the intensification/densification as a result of economic growth will generally increase the likelihood of flooding and extreme heating in the developed parts of the District.</p>	<p>The following policies should help to ensure impacts of the new homes, transport and infrastructure, site allocations and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Climate Change Policy 4: Water Efficiency.</li> <li>■ Climate Change Policy 5: Flood Risk.</li> <li>■ Climate Change Policy 6: Surface Water Management.</li> <li>■ Climate Change Policy 7: Coastal Change Management Areas.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design, Placemaking and the provision of Design Codes</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 1: Biodiversity Net Gain.</li> <li>■ Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.</li> <li>■ Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> </ul>



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SA8: Climate change	<p>New homes Strategic Policy 3 (Housing Growth) has the potential to generate a minor negative effect against this SA objective. This is because although the policy aims to strike a sustainable balance that minimises the need for new communities to travel privately via unsustainable modes of transport, hundreds of homes will be located in notably rural locations where good accessibility to a wide range of local services and facilities and jobs is less readily available. This is likely to result in the need for travel by private vehicles, increasing greenhouse gas emissions in the District. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the policies' focus on only delivering homes in rural locations at a scale consistent with their current accessibility, infrastructure provision and level of services available.</p> <p>Many site allocations policies are likely to have minor negative effects on this SA objective, namely Site Allocation Policies 1 (WHI001r and WHI008) and 31 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030) in Dover, 14 (DEA008), 15 (WAL002) and 16 (GTM003, TC4S008, TC4S032 and TC4S047) in Deal, 23 (SAN019r) in Sandwich and 26 (14 – Land off Holt Street) in Aylesham. In addition, all site allocations relating to local centres with the exception of Site Allocation Policies 29 (EYT008), 36 (SHE004r2 and TC4S082) and 37 (SHE006 and SHE008) are likely to have minor negative effects. Likewise, most site allocations relating to larger and smaller villages will have minor negative effects, with the exception of Site Allocation Policy 47 (LYD003r). This is because these sites are located in relatively remote locations, far from sustainably accessible local services and facilities, and job opportunities, resulting in a greater need to travel via private car, which is one of the primary sources of greenhouse gas emissions.</p> <p>Employment and local economy policies, namely Strategic Policy 6 (Economic Growth), Employment Policy 1 (New Employment Development) and Employment Policy 4 (Tourism Accommodation and Attractions) have the potential to generate minor negative effects against this SA objective. This is because the intensification, diversification and expansion of the District's economy is likely to create more greenhouse gas emissions. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Publication Local Plan's economic strategy generally focussing on areas of existing activity, rather than creating new areas of intense economic activity. Furthermore, Employment Policy 1 (New Employment Development) requires rural employment developments to demonstrate that it will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it. However, these potential remote locations will likely result in greater greenhouse gas emissions associated with workers and services having to travel to access these centres of economic growth. There are also requirements in the policies to improve the provision of sustainable travel options.</p> <p>Transport and infrastructure Strategic Policy 12 (Strategic Transport Infrastructure), Transport and Infrastructure Policy 2 (Transport Statements, Assessments and Travel Plans), Transport and Infrastructure Policy 3 (Parking Provision on New Development) and Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) have the potential to generate minor negative effects against this SA objective. This is because these policies promote highway infrastructure, which will increase the number of vehicles on the District's roads and therefore their associated greenhouse gas emissions.</p> <p>Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) has the potential to generate a mixed (minor positive and minor negative) effect against this SA objective in acknowledgement of the fact that although the policy promotes the protection of open and green space, it also sets out the circumstances in which open spaces, which play an important role in carbon sequestration, may be lost for development.</p>	<p>■ Natural Environment Policy 5: Water Quality and Supply.</p> <p>The following policies should help to ensure impacts of the new homes policies, site allocations, employment and local economy policies and transport and infrastructure policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 1: Reducing Carbon Emissions.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Climate Change Policy 3: Renewable and Low Carbon Energy Development.</li> <li>■ Transport and Infrastructure Policy 1: Sustainable Travel.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Employment Policy 3: Businesses Operating from a Residential Property.</li> <li>■ Employment Policy 4: Tourism Accommodation and Attractions.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 2: Sequential Test and Impact Assessment.</li> <li>■ Retail Policy 3: Local Shops.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Place Making Policy 1: Achieving High Quality Design, Placemaking and the provision of Design Codes.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 1: Biodiversity Net Gain.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> </ul> <p>The following policies should help to ensure impacts of Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 6: Community Facilities and Services.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> </ul>
SA9: Biodiversity	<p>Climate Change Policy 3 (Renewable and Low Carbon Energy Development) has the potential to generate minor adverse effects against this objective because it encourages the development of renewable and low carbon technologies which in certain circumstances may result in the loss of local habitats and species and generate pollution.</p> <p>New homes policies Strategic Policy 3 (Housing Growth), Housing Policy 2 (Rural Local Needs Housing) and Housing Policy 5 (Self-Build and Custom Housebuilding) will have minor negative effects against this SA</p>	<p>The following policies should help to ensure impacts of the Climate Change Policy 3 (Renewable and Low Carbon Energy Development), new homes policies, the site allocation policies, employment and local economy policies, transport and infrastructure policies and Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>objective. Several site allocation policies will have minor negative effects on this SA objective too. This is in acknowledgement of the findings of the Habitats Regulations Assessment (HRA) of the Publication Local Plan, that many of the site allocations are located on greenfield land and in close proximity to sensitive ecological habitats and the more general policies setting out the scenarios in which more specialist types of residential development might be permitted do not rule out the potential for some adverse effects on the District's natural environment being acceptable.</p> <p>Many site allocations policies will have negative effects on this SA objective. In Dover, <b>significant negative</b> effects are expected for Site Allocation Policies 1 (WHI001r and WHI008), 2 (7 - White Cliffs Business Park r3), 3 (18 - Dover Waterfront_r (employment) and DOV017r (residential)), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) and 13 (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026, TC4S027r, TC4S028 and TC4S030), whilst minor negative effects are expected for Site Allocation Policies 6 (21 MidTown_r - DOV018 (employment) and DOV018r Mid Town (residential)), 8 (DOV022B), 9 (DOV022E), 10 (DOV023), 11 (DOV026r) and 12 (DOV028). All of the Deal site allocations are expected to have minor negative effects. All but one of the site allocations in Sandwich are expected to have minor negative effects. One of the sites, Site Allocation Policy 18 (SAN006), is expected to have a <b>significant negative</b> effect. In Aylesham, <b>significant negative</b> effects are expected for Site Allocation Policies 24 (AYL003r2) and 26 (14 – Land off Holt Street), whilst a minor negative effect is expected for Site Allocation Policy 25 (4 – Aylesham Development Area). In the local centres, <b>significant negative</b> effects are expected for Site Allocation Policies 28 (EYT003, EYT009 and EYT012) and 31 (TC4S076), and minor negative effects are expected for Site Allocation Policies 30 (TC4S039r), 32 (EAS002), 33 (EAS009 and TC4S023), 34 (KIN002), 35 (TC4S074), 36 (SHE004r2 and TC4S082), 37 (SHE006 and SHE008), 38 (STM003), 40 (STM006 and STM010), 41 (WIN0014) and 42 (WIN003 and WIN004). In the larger villages, Site Allocation Policy 48 (PRE003, PRE016 and PRE017) is expected to have a <b>significant negative</b> effect, whilst Site Allocation Policies 44 (CAP006r), 45 (CAP009, CAP011 and CAP013), 46 (LAN003), 47 (LYD003r) and 49 (WOR006 and WOR009) are expected to have a minor negative effect. One of the sites in the smaller villages, Site Allocation Policy 55 (WOO005 and WOO006), is expected to have a minor negative effect against this objective. These negative effects are due to the fact all these sites fall within close proximity to European Sites and/or Sites of Special Scientific Interest and fall within their Impact Risk Zones as defined by Natural England, in addition to being located within close proximity of a locally designated wildlife site and/or ancient woodland.</p> <p>Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) has the potential to have a minor negative effect on biodiversity as the potential for new overnight lorry parking facilities may result in the loss of a notable area of greenfield land and ecological habitats.</p> <p>Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) has the potential to generate a minor negative effect against this SA objective in acknowledgement of the fact that the policy sets out the circumstances in which open spaces may be lost for development. In certain, albeit rare, circumstances this may result in the potential for the loss of greenfield land with some ecological value.</p> <p>Natural environment Strategic Policy 13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets) has the potential to generate minor negative effects against this SA objective. This is because the policy sets out the scenarios in which adverse effects on national and local biodiversity assets may be permitted, albeit in relatively rare occasions.</p>	<ul style="list-style-type: none"> <li>■ Climate Change Policy 5: Flood Risk.</li> <li>■ Climate Change Policy 6: Surface Water Management.</li> <li>■ Climate Change Policy 7: Coastal Change Management Areas.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design/Placemaking and the provision of Design Codes.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 1: Biodiversity Net Gain.</li> <li>■ Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.</li> <li>■ Natural Environment Policy 3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy.</li> <li>■ Natural Environment Policy 4: Air Quality.</li> <li>■ Natural Environment Policy 5: Water Quality and Supply.</li> </ul> <p>The vast majority of the same policies are likely to help effectively manage any potential impacts permitted by Strategic Policy 13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets).</p>
SA10: Historic environment	<p>Climate change policies, namely Strategic Policy 1 (Planning for Climate Change), Climate Change Policy 1 (Reducing Carbon Emissions) and Climate Change Policy 2 (Sustainable Design and Construction) have the potential to generate minor negative effects against this SA objective. This is because these policies promote climate change mitigation measures which have the potential to adversely affect the setting and significance of historic assets.</p> <p>New home policies Strategic Policy 3 (Housing Growth), Housing Policy 2 (Rural Local Needs Housing) and Housing Policy 4 (Gypsy and Traveller Windfall Accommodation) have the potential to generate minor negative effects against this SA objective. This is in acknowledgement of the fact that many of the site allocations are located within or in close proximity to known historic assets or within historic landscapes or townscapes. The policies setting out the scenarios in which more specialist types of residential development might be permitted do not rule out the potential for some adverse effects on the District's natural environment being acceptable.</p> <p>Many site allocations policies will have negative effects on this SA objective. Site allocations policies in Dover which are expected to result in minor negative effects are 1 (WHI001r and WHI008), 2 (7 - White Cliffs Business Park r3), 3 (18 - Dover Waterfront_r (employment) and DOV017r (residential)), 6 (21 MidTown_r - DOV018 (employment)), 7 (DOV017r2 res (residential) and DOV017r2 emp (employment)) and DOV018r Mid Town (residential)), 10 (DOV023), 12 (DOV028) and 13 (DOV006, DOV008, DOV019, DOV022C, DOV030,</p>	<p>The following policies should help to ensure impacts of the climate change policies, new homes policies, site allocation policies, employment and local economy policies and transport and infrastructure policies, in addition to Place Making Policy 5 (Protection of Open Space, Sports facilities and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Climate Change Policy 5: Flood Risk.</li> <li>■ Climate Change Policy 6: Surface Water Management.</li> <li>■ Climate Change Policy 7: Coastal Change Management Areas.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>TC4S026, TC4S027r, TC4S028 and TC4S030). All site allocation policies in Deal, Sandwich and Aylesham, are expected to have minor negative effects against this objective. In addition, with the exception of Site Allocation Policies 30 (TC4S039r), 40 (TC4S076), 35 (TC4S074), 38 (STM003) and 41 (WIN0014), all site allocation policies relating to local centres will have negative effects. Site Allocation Policy 39 (STM007 and STM008) is expected to have a <b>significant negative</b> effect whilst the others are expected to have a minor negative effect. All site allocation policies in larger and smaller villages, except Site Allocation Policies 43 (ALK003) and 48 (PRE003, PRE016 and PRE017), are expected to have minor negative effects on the historic environment. Site Allocation Policies 50 (GOO006) and 54 (STA004) are expected to have a <b>significant negative</b> effect. This is because these sites are located within close proximity of known historic assets or within historic landscapes or townscapes. Although the allocations generally make reference to the need for heritage assessments, there is still potential to affect the significance of known and unknown assets directly or indirectly.</p> <p>Employment and local economy Strategic Policy 6 (Economic Growth) has the potential to generate minor negative effects against this SA objective. The policy does not rule out the potential for some adverse effects on the District's historic environment being acceptable.</p> <p>Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) has the potential to have minor negative effects on the District's historic environment as the policy may result in development which could adversely affect the significance and/or setting of some of the District's historic assets, depending on their location.</p> <p>Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) has the potential to generate a minor negative effect against this SA objective in acknowledgement of the fact the policy sets out the circumstances in which open spaces may be lost for development. In certain, albeit rare, circumstances this may result in the potential for the loss of open land which makes a contribution to the setting and special character of the District's historic environment.</p> <p>Historic Environment Policy 1 (Designated and Non-designated Heritage Assets) has the potential to generate minor negative effects against this SA objective. This is because the policy sets out the scenarios in which loss or substantial harm to the significance of heritage assets may be permitted, albeit in relatively rare occasions.</p>	<ul style="list-style-type: none"> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 4: Shopfronts.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design Placemaking and the provision of Design Codes.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.</li> <li>■ Strategic Policy 15: Protecting the District's Historic Environment.</li> <li>■ Historic Environment Policy 1: Designated and Non-designated Heritage Assets.</li> <li>■ Historic Environment Policy 2: Conservation Areas.</li> <li>■ Historic Environment Policy 4: Historic Parks and Gardens.</li> </ul> <p>The vast majority of the same policies are likely to help effectively manage any potential impacts permitted by Historic Environment Policy 1 (Designated and Non-designated Heritage Assets).</p>
SA11: Landscape	<p>Climate change policies Strategic Policy 1 (Planning for Climate Change), Climate Change Policy 1 (Reducing Carbon Emissions) and 2 (Sustainable Design and Construction) have the potential to generate minor negative effects against this SA objective. This is because these policies promote climate change mitigation measures which have the potential to adversely affect landscape and townscape character. In addition, Climate Change Policy 3 (Renewable and Low Carbon Energy Development) has the potential to generate minor negative effects against this objective because it encourages the development of renewable and low carbon technologies which in certain circumstances may adversely affect the setting and special character of the District's sensitive landscapes, townscapes and seascapes.</p> <p>New homes policies Strategic Policy 4 (Residential Windfall Development), Housing Policy 2 (Rural Local Needs Housing) and Housing Policy 5 (Self-Build and Custom Housebuilding) have the potential to generate minor negative effects against this SA objective. This is because the general policies setting out the scenarios in which more specialist types of residential development might be permitted do not rule out the potential for some adverse effects on the District's natural/historic environment being acceptable.</p> <p>Many site allocations policies will have minor negative effects on this SA objective. Site Allocation Policy 2 (7 – White Cliffs Business Park_r3) in Dover and Site Allocation Policy 15 (WAL002) in Deal are expected to result in minor negative effects. In addition, site allocation policies in Sandwich which are expected to have minor negative effects on landscape and townscape are 18 (SAN006), 19 (SAN007), 20 (SAN008) and 22 (SAN023). Both Site Allocation Policies 24 (AYL003r2) and 26 (14 – Land off Holt Street) in Aylesham will also have minor negative effects. Site allocation policies relating to local centres which are expected to result in minor negative effects on the landscape are 30 (TC4S039r), 31 (EAS002), 33 (EAS009 and TC4S023), 34 (KIN002), 35 (TC4S074), 36 (SHE004r2 and TC4S082), 40 (STM006 and STM010) and 41 (WIN0014). Only Site Allocation Policy 45 (CAP009, CAP011 and CAP013) out of the larger villages and Site Allocation Policy 54 (STA004) out of the smaller villages are expected to result in minor negative effects. This is due to the fact these sites comprise sensitive landscapes and may result in adverse effects on the District's landscapes, townscapes and seascapes directly or indirectly.</p> <p>Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) has the potential to generate a minor negative effect against this SA objective in acknowledgement of the fact that the policy sets out the circumstances in which open spaces may be lost for development. In certain, albeit rare, circumstances this</p>	<p>The following policies should help to ensure impacts of the climate change policies, new homes policies, site allocations, employment and local economy policies and transport and infrastructure policies, in addition to Place Making Policy 5 (Protection of Open Space, Sports Facilities and Local Green Space) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> <li>■ Strategic Policy 1: Planning for Climate Change.</li> <li>■ Climate Change Policy 2: Sustainable Design and Construction.</li> <li>■ Climate Change Policy 5: Flood Risk.</li> <li>■ Climate Change Policy 6: Surface Water Management.</li> <li>■ Climate Change Policy 7: Coastal Change Management Areas.</li> <li>■ Climate Change Policy 8: Tree Planting and Protection.</li> <li>■ Strategic Policy 7: Retail and Town Centres.</li> <li>■ Strategic Policy 8: Dover Town Centre.</li> <li>■ Strategic Policy 9: Deal Town Centre.</li> <li>■ Strategic Policy 10: Sandwich Town Centre.</li> <li>■ Retail Policy 1: Primary Shopping Areas.</li> <li>■ Retail Policy 4: Shopfronts.</li> <li>■ Strategic Policy 11: Infrastructure and Developer Contributions.</li> <li>■ Place Making Policy 3: Providing Open Space.</li> <li>■ Strategic Policy 2: Planning for Healthy and Inclusive Communities.</li> <li>■ Place Making Policy 1: Achieving High Quality Design Placemaking and the provision of Design Codes.</li> <li>■ Strategic Policy 13: Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets.</li> <li>■ Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity.</li> <li>■ Natural Environment Policy 2: Landscape Character and the Kent Downs AONB.</li> </ul>

SA Objective	Potential Negative Effects of the Publication Local Plan Policies <sup>53</sup>	Potential Mitigation of Publication Local Plan Policies
	<p>may result in the potential for the loss of open land which makes a contribution to the setting and special character of the District's landscapes, townscapes and seascapes.</p> <p>Transport and Infrastructure Policy 4 (Overnight Lorry Parking Facilities) has the potential to have a minor negative effect on the District's landscapes and townscapes as the policy may result in development which could adversely affect the significance and/or setting of some of the District's sensitive landscapes and townscapes. This effect is recorded as minor and uncertain in acknowledgement of the fact that the exact location and sensitivities of future development is unknown.</p>	<ul style="list-style-type: none"> <li>■ Strategic Policy 15: Protecting the District's Historic Environment.</li> <li>■ Historic Environment Policy 1: Designated and Non-designated Heritage Assets.</li> <li>■ Historic Environment Policy 2: Conservation Areas.</li> <li>■ Historic Environment Policy 4: Historic Parks and Gardens.</li> </ul>

**7.511** In addition to the mitigation provided by the policies in the Publication Local Plan, large development proposals will be subject to The Town and County Planning (Environmental Impact Assessment) Regulations 2017 which will identify likely significant effects (both alone and cumulatively) on the environment at a site-level, along with mitigation measures to reduce and minimise impacts. Furthermore, strategic site allocations set out in Site Allocation Policy 1 (Whitfield Urban Expansion), Site Allocation Policy 24 (South Aylesham) and Site Allocation Policy 28 (Eythorne and Elvington) have, or are in the process of developing, masterplan documents, that once published, will be a material consideration in the determination and monitoring of planning applications for strategic allocations.

**7.512** Specific mitigation measures for development are more appropriately dealt with at the planning application stage when further detail regarding the layout and scale of development is known and the specific proposals will be judged against all of the policies in the Publication Local Plan. Mitigation may include planning conditions requiring: noise and dust management measures/limits; air quality reduction measures; ecological mitigation; hydrological/hydrogeological mitigation; flood risk reduction, pollution prevention and sustainable drainage implementation and management; landscape and ecological mitigation and management plans; separation distances/buffer zones between the development and sensitive receptors; phasing of development to minimise adverse effects on the environment and local communities; routeing agreements and/or travel plans to control and alleviate the effects of traffic movements; archaeological evaluation and watching briefs; or the incorporation of green infrastructure within landscape management plans and high quality restoration of sites.

## Habitats Regulations Assessment

**7.513** 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:

- Strategic Policy 3: Housing Growth.
- Strategic Policy 6: Economic Growth.
- Employment Policy 1: New Employment Development.
- Site Allocation Policy 1: Whitfield Urban Expansion (WHI001r and WHI008).
- Site Allocation Policy 2: White Cliffs Business Park (7 – White Cliffs Business Park Park\_r3).
- Site Allocation Policy 3: Dover Waterfront (18 – Dover Waterfront\_r (employment) and DOV017r (residential)).
- Site Allocation Policy 4: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (23r – Western Heights res (residential) and 23r – Western Heights emp (employment)).
- Site Allocation Policy 5: Fort Burgoyne (TC4S092).
- Site Allocation Policy 6: Dover Mid Town (21 MidTown\_r – DOV018 (employment) and DOV018r (residential)).
- Site Allocation Policy 7: Bench Street (DOV017r2 res (residential) and DOV017r2 emp (employment)).
- Site Allocation Policy 8: Land adjacent to the Gas Holder, Coombe Valley Road, Dover (DOV022B).
- Site Allocation Policy 9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover (DOV022E).
- Site Allocation Policy 10: Buckland Paper Mill, Crabble Hill, Dover (DOV023).
- Site Allocation Policy 11: Westmount College, Folkestone Road, Dover (DOV026r).
- Site Allocation Policy 12: Charlton Shopping Centre, High Street, Dover (DOV028).
- Site Allocation Policy 13: Dover Small Sites Policies (DOV006, DOV008, DOV019, DOV022C, DOV030, TC4S026r, TC4S027r, TC4S028 and TC4S030).
- Site Allocation Policy 14: Land off Cross Road, Deal (DEA008).
- Site Allocation Policy 15: Land at Rays Bottom between Liverpool Road and Hawksdown, Walmer (WAL002).
- Site Allocation Policy 16: Deal Small Sites (GTM003, TC4S008, TC4S032 and TC4S047).
- 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).
- Site Allocation Policy 24: South Aylesham (AYL003r2).
- Site Allocation Policy 25: Aylesham Development Area (4 – Aylesham Development Area).
- Site Allocation Policy 26: Former Snowdown Colliery (14 – Land off Holt Street).

- Site Allocation Policy 27: Land at Dorman Avenue (AYL001).
- Site Allocation Policy 28: Land between Eythorne and Elvington (EYT003, EYT009 and EYT012).
- Site Allocation Policy 29: Land on the south eastern side of Roman Way, Elvington (EYT008).
- Site Allocation Policy 30: Chapel Hill, Eythorne (TC4S039r).
- Site Allocation Policy 31: Statenborough Farm (TC4S076).
- Site Allocation Policy 32: Land at Buttsole Pond, Lower Street, Eastry (EAS002).
- Site Allocation Policy 33: Eastry Small Sites (EAS009 and TC4S023).
- Site Allocation Policy 34: Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002).
- Site Allocation Policy 35: Land adjacent to Courtlands, Kingsdown (TC4S074).
- Site Allocation Policy 36: Land to the north and east of St Andrews Gardens and adjacent to Mill House Shepherdswell (SHE004r2 and TC4S082).
- Site Allocation Policy 37: Shepherdswell Small Sites (SHE006 and SHE008).
- Site Allocation Policy 38: Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way, St Margarets at Cliffe (STM003).
- Site Allocation Policy 39: Land to the west of Townsend Farm Road St Margarets at Cliffe (STM007 and STM008).
- Site Allocation Policy 40: St Margaret's Small Sites (STM006 and STM010).
- Site Allocation Policy 41: Footpath Field, Staple Road, Wingham (WIN0014).
- Site Allocation Policy 42: Wingham Small Sites (WIN003 and WIN004).
- Site Allocation Policy 43: Land at Short Lane, Alkham (ALK003).
- Site Allocation Policy 44: Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006r).
- Site Allocation Policy 45: Capel Small Sites (CAP009, CAP011 and CAP013).
- Site Allocation Policy 46: Land adjacent Langdon Court Bungalow, The Street, East Langdon (LAN003).
- Site Allocation Policy 47: Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003r).
- Site Allocation Policy 48: Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston (PRE003, PRE016 and PRE017).
- Site Allocation Policy 49: Worth Small Sites (WOR006 and WOR009).
- Site Allocation Policy 50: Land adjacent to Short Street, Chillenden (GOO006).
- Site Allocation Policy 51: Land opposite the Confiers, Coldred (SHE013).
- Site Allocation Policy 52: Prima Windows, Easole Street/Sandwich Road, Nonington (NON006r).
- Site Allocation Policy 53: Ringwould Small Sites (RIN002 and RIN004).
- Site Allocation Policy 54: Land at Durlock Road, Staple (STA004).
- Site Allocation Policy 55: Woodnesborough Small Sites (WOO005 and WOO006).

**7.514** 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 Escarpment 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.

**7.515** The Appropriate Assessment stage identified whether the above likely significant effects will, in light of mitigation and avoidance measures, result in adverse effects on the integrity (AEoI) of the European sites either alone or in-combination with other plans or projects. The Appropriate Assessment concluded that no AEoI will occur for the following European sites subject to the provision of appropriate safeguarding and mitigation measures:

- Physical damage and loss to Thanet Coast and Sandwich Bay SPA and Ramsar, Stodmarsh SPA and Ramsar and Dungeness, Romney Marsh and Rye Bay pSPA provided that the Local Plan requires wintering bird surveys to be undertaken for site allocations identified as having high or moderate suitability for qualifying bird species, and where such surveys identify the potential for site allocations to exceed the threshold of significance i.e. >1% of the associated European Sites bird population that there is a commitment in the Local Plan for specific mitigation, such as the provision of suitable habitat for wintering birds.
- Non-physical disturbance to Thanet Coast and Sandwich Bay SPA and Ramsar provided the wording in Strategic Policy 13: Hierarchy of Designated Environmental Sites and Biodiversity Assets and Strategic Policy 14: Enhancing Green Infrastructure and Biodiversity includes specific detail on the requirement to protect European sites from AEoI, such as a commitment for development within 500m of the SPA and Ramsar to demonstrate through a project level assessment that no AEoI will occur.
- 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 Escarpment SAC. This is provided that the broad mitigation measures detailed within the Council's Air Quality Assessment (2020) are implemented.
- Recreational pressure in relation to all European sites provided the Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy is successfully delivered, visitor monitoring surveys continue to be updated, new natural green space and green infrastructure is provided.
- The Appropriate Assessment concluded no adverse effects on integrity as a result of water quantity and quality providing the safeguards and mitigation measures detailed within the Local Plan are implemented successfully. This included requirements for all new development to meet water efficiency standards and to demonstrate that there is adequate water supply and wastewater treatment facilities to serve the whole development without adverse effects on European sites.

## Duration of Effects

**7.516** The Publication Local Plan sets out how the growth will be planned, facilitated and managed over the Plan period up to 2040. Effects may be experienced in the short-term (defined for this SA as over the next five years), medium-term (defined as over the next 10 years), or long-term effects (defined as over the whole Plan period). Given the nature of the policies in the Publication Local Plan, it is difficult to be precise about when, where and in what form all the effects will arise, and how one effect might relate to another. However, it is possible to draw some broad conclusions about the nature and interrelationship of the effects that the SA has identified:

**7.517** Most of the effects will be long-term, in that the Publication Local Plan aims to facilitate and manage growth and associated infrastructure that will last over time. There will be some temporary and short- or medium-term effects during site allocation preparation, construction or operation (see below).

**7.518** The effects which have been identified in the appraisal of the Publication Local Plan, both positive and negative, are likely to increase over time, as the policies in the plan are implemented, and more developments are delivered in the District.

### Short-term effects

**7.519** The impacts of the Publication Local Plan in the short-term are mostly related to the initial impacts of commencing development early in the Plan period. These will include the removal of vegetation, soil, and provision of infrastructure required. Such works could have negative impacts on biodiversity, health and well-being, amenity of local communities (possible disruption to rights of way, traffic flows, noise generation, vibration, dust etc.), soil quality, and the landscape. However, these impacts are temporary in nature, and some may be minimised through good design, adherence to the policies in the Publication Local Plan or reversed through restoration measures in the long-term.

### Medium-term effects

**7.520** Medium-term positive impacts relate to the employment and economic benefits of development, new communities and employment centres. Negative impacts in the medium-term include the implications of having greater densities of residents and workers in parts of the District on health and well-being, the amenity of local communities (e.g. noise, increased traffic etc.), and on environmental quality. However, these impacts should be avoided or mitigated through the adherence to the policies in the Publication Local Plan when planning proposals are assessed and determined by the District Council.

### Long-term effects

**7.521** Long-term, permanent benefits that would result from the Publication Local Plan include the provision of sufficient homes, new service, facilities and infrastructure and employment opportunities to meet the District's needs. New developments will also enable flood alleviation schemes, habitat creation and biodiversity enhancement, recreation enhancement as well and the conservation of the District's landscapes and historic environment. Long-term, permanent negative impacts of the Publication Local Plan are potentially: loss of habitats, areas of Best & Most Versatile Agricultural Land; and climate change implications of the energy required to power new homes and businesses and vehicle movements to and from waste sites, at least until zero carbon alternatives are full implemented towards the end of the Plan period.

### Secondary, Cumulative and Synergistic Effects

**7.522** Secondary (or indirect) effects are effects that are not a direct result of a policy or site allocation but occur away from the original effect or as a result of a complex pathway. Cumulative effects occur where two or more impacts combine to form a significant impact. Synergistic effects occur as the result of interactions between individual effects producing a total effect greater than the sum of each of the individual effects. Secondary, cumulative or synergistic effects may be either positive or negative.

**7.523 Table 7.19** summarises the net effect of the Publication Local Plan as a whole against each SA objective. The reasoning for the identification of these effects is set out by SA objective below.

#### SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home

**7.524** The Publication Local Plan plans to deliver the full range and quantity of the District's housing needs over the Plan period, across a mix of strategic and smaller site allocations. The Publication Local Plan is therefore likely to generate a significant positive effect against this SA objective. However, this is mixed with the potential for some negative effects, acknowledging the fact that not all of the District's affordable home requirements are likely to be met in the locations they are needed, i.e. in Dover. Overall, these potential adverse effects are recorded as minor, noting that a significant number of affordable homes are to be developed in relatively close proximity to Dover within the Whitfield Urban Expansion strategic allocation.

#### SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration

**7.525** The Publication Local Plan sets out a growth and spatial strategy to meet the housing and economic needs of the District. The majority of the new communities and investment in local services, facilities and infrastructure will be focussed in and around the District's existing larger settlements of Dover, Deal and Sandwich, maximising the potential of these sustainable locations. There also some strategic allocations planned in the District's rural communities, including at Aylesham, Eythorne and Elvington. These rural locations have relatively good sustainable transport connections, and there are plans to develop new local services and facilities to meet the needs of these growing communities.

**7.526** The Publication Local Plan also sets out a framework for ensuring the District is climate change resilient and the District's natural, historic and recreation assets are safeguarded and enhanced. The Publication Local Plan is therefore likely to generate a significant positive effect against this SA objective. However, this is mixed with the potential for some adverse effects associated with the scale and distribution of growth planned, which is likely to result in some disruption to existing communities, particularly during key construction phases.

**7.527** There is likely to be significant increases in road traffic, particularly on the District's strategic highway network which connects the District's largest centres (the focus of its planned growth) and neighbouring centres. Noting the considerable investment planned in the strategic highway network and other strategic assets, such as green infrastructure and digital connectivity, over the Plan period these adverse effects are recorded as minor negative effects overall.

#### SA 3: To deliver and maintain sustainable and diverse employment opportunities

**7.528** The Publication Local Plan plans to deliver the full range and quantity of the District's employment needs over the Plan period, across a mix of existing large and small site allocations. The Publication Local Plan also aims to deliver significant economic growth in the District's economic centres, including in and around Dover and Aylesham. The Publication Local Plan is therefore likely to generate a significant positive effect against this SA objective.



#### **SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion**

**7.529** The Publication Local Plan focuses the majority of its planned growth in and around the District's existing regional and local centres where there is more potential to maximise the potential sustainable transport modes and mitigate the adverse effects of greater numbers of commuters, visitors and commercial transit on the strategic highway network. Although there are some strategic allocations planned in the District's rural communities, including at Aylesham, Eythorne and Elvington, these relatively rural locations have good sustainable transport connections, and there are plans to develop new local services and facilities to meet the needs of these growing communities. The Publication Local Plan also sets out a framework for making sure new developments contribute to the infrastructure requirements they generate. The Publication Local Plan is therefore likely to generate a significant positive effect against this SA objective.

**7.530** However, a significant number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective.

**7.531** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Publication Local Plan's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available. There are also plans for considerable investment in the strategic highway network over the Plan period.

#### **SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters**

**7.532** A significant proportion of the growth planned within the District will be on greenfield land, potentially resulting in the loss of significant areas of the District's best and most versatile agricultural land and mineral resources, both of which are finite resources that cannot be replaced. Of the 69 sites allocated for housing in the Plan, 45 are greenfield and 24 are brownfield sites. In terms of the provision of new homes, 76.7% of the new homes proposed on site allocations in the plan are on greenfield sites, and 23.3% are on brownfield sites<sup>54</sup>. Therefore, the Publication Local Plan is likely to generate significant negative effects against this SA objective. However, the Publication Local Plan prioritises the development and regeneration of previously developed land in the existing urban areas of the District, notably in Dover and the District's existing employment sites. Therefore, a minor positive effect is also recorded against this SA objective, overall.

#### **SA 6: To reduce air pollution and ensure air quality continues to improve**

**7.533** The Publication Local Plan is considered likely to generate a combination of minor positive and minor negative effects against this SA objective. This is because the Publication Local Plan focuses growth in the District's existing centres where there is the greatest potential to take advantage of sustainable modes of transport and forms of energy production that generate less air pollution than traditional technologies fuelled by fossil fuels.

**7.534** However, it is also acknowledged that this strategy concentrates new communities and commercial activity in the vicinity of areas of the District already known to have poor air quality. Greater growth in these locations therefore also has the potential to increase road congestion, at least in the short term, until suitable avoidance and mitigation measures have been put in place alongside the planned investments in the District's strategic highway network.

#### **SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change**

**7.535** 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.

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<sup>54</sup> In Chapter 5 of the SA, 75 residential site allocations are recorded. Reference is made here to 69 residential site allocations because Dover District Council took the decision to combine some of the sites appraised separately in the SA into one: (1) WHI001r and WHI008; (2) EYT003, EYT009 and EYT012; (3) SHE004r2 and TC4S082; (4) STM007 and STM008; (5) PRE003, PRE016 and PRE017; and (6) RIN002 and RIN004. The sites have been combined and each allocation policy appraised as one in Chapter 7 of the SA.

**7.536** There are also policies which prioritise investment in and the enhancement of the District's green infrastructure network and water quality and supply.

**7.537** Therefore, overall, the Publication Local Plan is considered likely to generate mixed minor positive and minor negative effects against this SA objective.

#### **SA 8: To mitigate climate change by actively reducing greenhouse gas emissions**

**7.538** The Publication Local Plan focuses the majority of its planned growth in and around the District's existing regional and local centres where there is more potential to maximise the potential sustainable transport modes, energy efficiency and renewable and low carbon technologies.

**7.539** Furthermore, the Publication Local Plan devotes a chapter of policies to delivering climate change mitigation and adaptation measures, covering reducing carbon emissions, sustainable design and construction, renewable and low carbon energy and sustainable travel. The Publication Local Plan is therefore likely to generate a significant positive effect against this SA objective. However, a significant number of homes (1,122) are also to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available, resulting in the potential for some adverse effects against this SA objective.

**7.540** Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Publication Local Plan's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available.

#### **SA 9: To conserve, connect and enhance the District's wildlife habitats and species**

**7.541** A significant proportion of the growth planned within the District will be on greenfield land. Although the vast majority of this land is not formally designated as being of notable ecological sensitivity/value, many of the allocations lie in close proximity to sensitive ecological areas designated for their habitats and species of international, national and local value. There is therefore the potential for cumulative adverse effects associated with the increased levels of activity and pollution in close proximity to these ecological assets.

**7.542** The Publication Local Plan devotes a chapter of policies to conserving and enhancing the District's natural environment, covering the expansion of the green infrastructure network, biodiversity net gain and a mitigation strategy for the Thanet Coast and Sandwich Bay Special Protection Area (SPA). However, the Habitats Regulations Assessment (HRA) of the Publication Local Plan concludes that adverse effects on the integrity of local European sites cannot be ruled out until further information is provided, and where necessary appropriate mitigation measures are put in place, to rule out water quality effects.

**7.543** Therefore, at this stage in the plan-making process, overall, the Publication Local Plan is recorded as having the potential to generate mixed significant negative and minor positive effects against this SA objective.

#### **SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment**

**7.544** A significant proportion of the growth planned within the District will be in close proximity to designated and non-designated historic assets in the District. Although the vast majority of the allocations take account of the significance and setting of these assets, a general increase in the density of historic settlements and investment in the intensification of commercial activities has the potential for cumulative adverse effects on the District's historic environment.

**7.545** However, the Publication Local Plan contains several policies that focus on protecting and enhancing the District's historic significance, sites and distinctive characteristics, covering sensitive placemaking, landscape character, designated and non-designated heritage assets and archaeology. Therefore, overall, the Publication Local Plan is considered likely to generate mixed minor positive and minor negative effects against this SA objective.

#### **SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside**

**7.546** A significant proportion of the growth planned within the District will be on greenfield land. Although the vast majority of this land is not formally designated as being of notable landscape sensitivity/value, many of the allocations lie in close proximity

the Kent Downs Area of Outstanding Natural Beauty (AONB) and the District's heritage coast. There are also plans to increase the density of urban and rural settlements, resulting in the loss of some open spaces. There is therefore the potential for cumulative adverse effects on the District's sensitive landscapes, townscapes and seascapes.

**7.547** However, the Publication Local Plan contains several policies that focus on protecting and enhancing the District's character and distinctiveness through good design, the promotion of climate change resilience and the conservation and enhancement of the District's landscape and historic assets, including retail and town centres. Therefore, overall, the Publication Local Plan is considered likely to generate mixed minor positive and minor negative effects against this SA objective.

**Table 7.19: Secondary, cumulative and synergistic effects of the Publication Local Plan**

SA Objective	Effects
SA1: Housing	++/- Mixed significant positive and minor negative effect likely
SA2: Health and well-being	++/- Mixed significant positive and minor negative effect likely
SA3: Employment	++ Significant positive effect likely
SA4: Travel	++/- Mixed significant and minor positive effect likely
SA5: Natural resources	--/+ Mixed significant negative and minor positive effect likely
SA6: Air pollution	+/- Mixed minor effect likely
SA7: Climate change adaptation	+/- Mixed minor effect likely
SA8: Climate change mitigation	++/- Mixed significant positive and minor negative effect likely
SA9: Biodiversity	--/+ Mixed significant negative and minor positive effect likely
SA10: Historic environment	+/- Mixed minor effect likely
SA11: Landscape and townscape	+/- Mixed minor effect likely

### Cumulative effects at the settlement level

**7.548** Relatively significant expansions to existing settlements have the potential to have more of a localised positive and negative impact when compared to smaller allocations in relatively large settlements. Therefore, the effects identified throughout this chapter are likely to be particularly acutely felt in the following settlements:

- Aylesham (two site allocations delivering roughly 650 new homes in total, including 640 homes south of Aylesham, plus employment development south of Aylesham in the Aylesham Development Area and the former Snowdown Colliery).
- Capel le Ferne (four site allocations delivering 95 new homes in total).
- East Langdon (although only one site delivering 40 new homes is allocated it is relatively large given the small size of the settlement).
- Eastry (three site allocations delivering 95 new homes in total).
- Elvington and Eythorne (three site allocations<sup>55</sup> delivering 355 new homes in total, of which one is a strategic allocation for 300 homes, known as land between Eythorne and Elvington).
- Kingsdown (two site allocations delivering 55 new homes in total).
- Nonington (although only one site delivering 35 new homes is allocated it is relatively large given the small size of the settlement).
- Lydden (although only one site delivering 30 new homes is allocated it is relatively large given the small size of the settlement).

<sup>55</sup> EYT003, EYT009 and EYT012 have been combined into one site. The three site allocations at Elvington and Eythorne are: (1) Site Allocation Policy 28 (EYT003, EYT009 and EYT012); (2) Site Allocation Policy 29 (EYT008); and (3) Site Allocation Policy 30 (includes TC4S039r).

- Preston (one site allocation<sup>56</sup> delivering 65 new homes in total).
- Shepherdswell (three site allocations<sup>57</sup> delivering 70 new homes in total).
- St Margaret's at Cliffe (four site allocations<sup>58</sup> delivering 96 new homes in total).
- Wingham (three site allocations delivering 103 new homes in total).
- Woodnesborough (although only two sites delivering 15 new homes are allocated, together they are relatively large given the small size of the settlement).
- Worth (two site allocations delivering 25 new homes in total).

**7.549** Where the scale of development proposed is particularly large compared to the size of the existing settlement, there is the potential for the character and identity of the settlement to change over the Plan period, including increased local traffic, as well as temporary effects of disturbance during construction. On the other hand, such development will give a greater choice of housing, including affordable housing, for local people as well as incomers, and will help to support local shops and community services and facilities.

**7.550** These kinds of cumulative effect are more likely to be absorbed by some of the larger existing settlements in the District, such as in and around Dover/Whitfield, Deal and Sandwich, but with each of these settlements also receiving multiple allocations, such cumulative effects are still likely to exist in and around these settlements.

### Potential In-Combination Effects with Other Plans, Policies and Programmes

**7.551** Dover District abuts three other local authority areas each of which plan for their respective housing and employment needs through their own Local Plans. The effects of the planned growth within Publication Local Plan also interact with the effects of the development and infrastructure planned at the County level by Kent County Council.

**7.552 Table 7.20** draws on the latest regional plan, programme and project information to summarise planned housing and employment growth within the immediate vicinity over the next 20 years.

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<sup>56</sup> PRE003, PRE016 and PRE017 have been combined into one site: Site Allocation Policy 48 (PRE003, PRE016 and PRE017).

<sup>57</sup> SHE004r2 and TC4S082 have been combined into one site. The four site allocations at Shepherdswell are: (1) Site Allocation Policy 36 (SHE004r2 and TC4S082); (2) Site Allocation Policy 37 (includes SHE006); (3) Site Allocation Policy 37 (includes SHE008); and (4) Site Allocation Policy 51 (includes SHE013).

<sup>58</sup> STM007 and STM008 have been combined into one site. The four site allocations at St Margaret's at Cliffe are: (1) Site Allocation Policy 38 (STM003); (2) Site Allocation Policy 40 (includes STM006); (3) Site Allocation Policy 39 (STM007 and STM008); and (4) Site Allocation Policy 40 (includes STM010).

Table 7.20: Other projects, plans and programmes delivering growth in and around Dover District

Project/Plan	Time Period	Housing Growth	Employment Growth	Strategic Infrastructure
Canterbury Local Plan (Adopted July 2017) <sup>59</sup>	2011-2031	Approximately 16,000 dwellings.	Approximately 125,000sqm.	N/A
Folkestone and Hythe Places and Policies Local Plan (Adopted September 2020) <sup>60</sup> Folkestone and Hythe Core Strategy Review (Adopted July 2022) <sup>61</sup>	2020-2037	A minimum of 13,284 dwellings.	Approximately 72,500sqm.	Otterpool Park is a proposed new garden town northwest of Folkestone on the M20 and HS1 railway line. It will provide a minimum of circa 5,600 new homes and approximately 36,760sqm net of employment floorspace by 2037 <sup>62</sup> .
Thanet Local Plan (Adopted July 2020) <sup>63</sup>	2020-2031	A minimum of 17,140 dwellings.	A minimum of 5,000 additional jobs.	N/A
Kent Minerals and Waste Local Plan, as amended by the Early Partial Review (Adopted September 2020) <sup>64</sup>	2013 -2030	N/A	N/A	Dover's wharves and rail depots are safeguarded through Policy CSM 6 Safeguarded Wharves and Rail Depots. Rowling Chalk Quarry.
Lower Thames Crossing <sup>65</sup>	Estimated 2022-2028	N/A	N/A	The Lower Thames Crossing is a proposed Nationally Significant Infrastructure Project (NSIP) that will connect Kent, Thurrock and Essex through a tunnel beneath the river Thames. The project would include the longest road tunnel in the UK, stretching 2.6 miles, 14.3 miles of new road and roughly 50 new bridges and viaducts.

<sup>59</sup> Canterbury City Council (Adopted July 2017). Canterbury Local Plan (see [https://www.canterbury.gov.uk/downloads/file/868/canterbury\\_district\\_local\\_plan\\_adopted\\_july\\_2017](https://www.canterbury.gov.uk/downloads/file/868/canterbury_district_local_plan_adopted_july_2017))

<sup>60</sup> Folkestone & Hythe District Council (Adopted September 2020). Places and Policies Local Plan. (see [https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places\\_and\\_Policies\\_Local\\_Plan\\_2020.pdf?m=637370773065900000](https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places_and_Policies_Local_Plan_2020.pdf?m=637370773065900000))

<sup>61</sup> Folkestone & Hythe District Council (Adopted July 2022). Core Strategy Review. (see [https://folkestone-hythe.gov.uk/media/4873/Core-Strategy-Review-2022/pdf/Core\\_Strategy\\_Review\\_2022.pdf?m=6378484302166700000](https://folkestone-hythe.gov.uk/media/4873/Core-Strategy-Review-2022/pdf/Core_Strategy_Review_2022.pdf?m=6378484302166700000))

<sup>62</sup> Folkestone & Hythe District Council (February 2020). Core Strategy Review. (see [https://www.folkestone-hythe.gov.uk/media/2218/Folkestone-Hythe-Core-Strategy-Review-Submission-Draft-2020-EB-01-00-/pdf/Folkestone\\_Hythe\\_Core\\_Strategy\\_Review\\_Submission\\_Draft\\_2020\\_\(EB\\_01.00\).pdf?m=637200457103070000](https://www.folkestone-hythe.gov.uk/media/2218/Folkestone-Hythe-Core-Strategy-Review-Submission-Draft-2020-EB-01-00-/pdf/Folkestone_Hythe_Core_Strategy_Review_Submission_Draft_2020_(EB_01.00).pdf?m=637200457103070000))

<sup>63</sup> Thanet District Council (Adopted September 2020). Thanet Local Plan (see <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>)

<sup>64</sup> Kent County Council (Adopted September 2020). Kent Minerals and Waste Local Plan. (see <https://www.kent.gov.uk/about-the-Council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1>)

<sup>65</sup> Kent County Council (n.d.). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

Project/Plan	Time Period	Housing Growth	Employment Growth	Strategic Infrastructure
Dover Western Docks Revival/Port Expansion <sup>66</sup>	2017-2020	N/A	N/A	The project is transforming the waterfront with a new marina pier and curve to attract a host of shops, bars, cafes and restaurants. Dover's cargo business is being relocated to a new cargo terminal and distribution centre, creating greater space within the Eastern Docks for ferry traffic and much needed high quality employment opportunities for local people.
The managed expansion of Whitfield <sup>67</sup>	2010-2050	A minimum of 5,750 dwellings.	Supporting services, including restaurants, retail, financial and professional offices.	The urban expansion of Whitfield (CP11) identified as a strategic allocation in the Dover Core Strategy 2010 will continue during the lifetime of this Local Plan and will be delivered over the period to 2050, in accordance with the timescale set out in a revised SPD which will accompany this Plan.
Bifurcation of Port traffic (M2/M20) and A299/A249 <sup>68</sup>	2016-ongoing	N/A	N/A	Measures to split traffic to and from the Channel ports between the M20/A20 and M2/A2 routes, specifically the Dover Western and Eastern Docks and the Channel Tunnel.
Solution to Operation Stack	2018-ongoing	N/A	N/A	Plans to develop an area for up to 3,600 Heavy Goods Vehicles to alleviate congestion to sections of M20 when there is disruption at the Port of Dover and/or Eurotunnel.
Manston Airport Expansion <sup>69</sup>	2020-ongoing	N/A	N/A	Plans to develop an air freight hub at Manston Airport, including passenger services and business aviation. It is estimated that the expansion will accommodate 10,000 air cargo movements a year by its sixth year of operation, which equates to 14 arrival and 14 departures a day.

<sup>66</sup> Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. Available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf).

<sup>67</sup> Adopted Dover Core Strategy 2010. Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Adopted-Core-Strategy.pdf>.

<sup>68</sup> Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. Available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf).

<sup>69</sup> RSP. Building a strong economic future in Kent. Available at: <https://rsp.co.uk/reopening-manston/>.

**7.553** It is apparent from the above table that a significant amount of development is proposed in and around Dover District. This is likely to result in increased indirect pressure on the District's landscapes, green spaces and countryside, and biodiversity, and could lead to further pressure on the historic environment. Development outside the District would not directly affect the District's assets, but there could be indirect impacts e.g. development close to the District boundary could affect the setting of designated historic assets, new residents from neighbouring Districts could result in increased recreational pressure on designated biodiversity assets in the District, and ecological networks could be further eroded.

**7.554** The combined increase in traffic flows in Dover and in neighbouring authorities could result in an intensification in noise and air pollution (including increased greenhouse gas emissions), which could in turn affect the health of existing and new residents and workers, as well as sensitive habitats and wildlife species. There is also potential for additional traffic congestion in the District associated with implications of Brexit and the expansion of Dover Port, although this is set to be mitigated by planned highway projects such as the bifurcation of Dover Port traffic and a planned solution to Operation Stack.

**7.555** There is a need for the Council to work with Southern Water, the Environment Agency and neighbouring authorities to ensure that the planned growth is taken into account in future rounds of Asset Management Planning to ensure that there is scope for the existing water resource availability and wastewater treatment works within and outside the District to be upgraded to respond to growth in the District and neighbouring authorities.

**7.556** Additional waste will be generated through development in the District and neighbouring districts; however, this will be managed through the adopted Kent Waste and Minerals Local Plan.

**7.557** In addition, National Highways is proposing the construction of a new tunnel under the Thames to the east of Tilbury and Gravesend, called the 'Lower Thames Crossing' providing better connections between Kent and Essex, the Midlands and the north. This national infrastructure project is likely to cause significant disruption during its construction, but in the long term make a significant positive contribution to the accessibility of the region.

**7.558** Overall, relative to the scale of housing and employment growth across the area and associated highways, waste and minerals infrastructure investment, the Publication Local Plan is not likely to significantly affect the significance or distribution of environmental, social and economic effects across the area as a whole.

**7.559** Generally, the geographical spread of growth and infrastructure investment across the area is considered to be disparate enough not to generate perceptibly significant environmental, social and economic effects in any particular area. The notable exception is the concentration of housing, employment and infrastructure investment in and around Dover over the next 20 years associated with the expansion of the Port and the mitigation measures being put in place to prevent congestion into and out of the town and port. The timely phasing, delivery and associated mitigation of the effects of the infrastructure investment will be key to managing the cumulative effects of these plans and projects in the District.

# Chapter 8

## Monitoring

**8.1** The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

**8.2** Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing a local plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

**8.3** **Table 8.1** sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan, which draw on existing monitoring arrangements. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**8.4** This table has been updated at various stages of the Local Plan preparation to reflect any revisions made to the proposed monitoring indicators for the Local Plan itself. The indicators within the Local Plan will include more detail on the specific data to be collected to monitor each objective and Local Plan policy, the target set by the Local Plan policy and the data sources which will be used to enable the effective reporting of the indicators. It should be noted that some indicators will be used to monitor multiple objectives and policies. The indicators for the Local Plan and SA are therefore combined and will reported on annually as part of the Authority Monitoring Report (AMR).

**Table 8.1: Proposed monitoring indicators**

SA Objective	Proposed Monitoring Indicators
<p>SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.</p>	<ul style="list-style-type: none"> <li>■ Progress in the delivery of the Local Plan strategic and non-strategic housing allocations and dwellings by monitoring year and Plan period.</li> <li>■ Level and location (by settlement) of new windfall housing development by monitoring year and Plan period.</li> <li>■ Net annual affordable housing dwelling completions by tenure type and location/area within the District.</li> <li>■ Qualifying applications approved that have not met the affordable housing tenure split.</li> <li>■ Rural local needs housing dwellings permitted and completed, by tenure type and location/area within the District.</li> <li>■ Type and mix of homes permitted and completed.</li> <li>■ Number of custom and self-build plots approved and completed, by location/area within the District.</li> <li>■ Number of self-build plots returned unsold.</li> <li>■ Number and location of Houses in Multiple Occupation permitted by ward.</li> </ul>



SA Objective	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Number of planning applications referred to a Design Review Panel.</li> <li>■ Number of applications where Design Codes have been prepared.</li> <li>■ Percentage of appeals allowed on design grounds.</li> <li>■ Percentage of new residential developments that meet the latest Nationally Described Space Standards.</li> <li>■ Percentage of units approved and completed which are: M4(2) accessible and adaptable dwellings compliant and M4(3) wheelchair use dwellings compliant.</li> <li>■ Pitches permitted on intensification sites.</li> <li>■ Pitches lost.</li> <li>■ Pitches on alternative windfall sites permitted.</li> <li>■ Annual applications determined, which apply policy on extensions and annexes (permitted and refused).</li> </ul>
<p>SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration.</p>	<ul style="list-style-type: none"> <li>■ Percentage change in life expectancy and levels of deprivation (Indices of Multiple Deprivation).</li> <li>■ Percentage change in crime levels.</li> <li>■ Number of cultural and public art projects delivered in the District.</li> <li>■ Air Quality Exceedances and number of new Air Quality Management Areas declared.</li> <li>■ Developer contributions secured to deliver public realm improvements.</li> <li>■ Amount and type of new strategic open space delivered.</li> <li>■ Amount and type of open space provided in new residential developments.</li> <li>■ Developer contributions received for open space projects.</li> <li>■ Number of new indoor and outdoor sports facilities and playing pitches provided and/or enhancements to existing.</li> <li>■ Developer contributions received for indoor sports facilities and outdoor playing pitches and sports facilities.</li> <li>■ Loss and gains of public open space and Local Green Space.</li> <li>■ Losses and gains of new, or enhancements to existing, community facilities</li> <li>■ Developer contributions received for community facilities.</li> <li>■ Percentage of new development enabling Fibre To The Premises.</li> </ul>
<p>SA 3: To deliver and maintain sustainable and diverse employment opportunities.</p>	<ul style="list-style-type: none"> <li>■ Gains and losses in employment floorspace.</li> <li>■ Location of new employment development.</li> <li>■ Applications for businesses operating from a residential property.</li> <li>■ Progress in the delivery of the Local Plan employment allocations.</li> <li>■ Working age population, compared to Kent, the South East and the UK.</li> <li>■ Total jobs and job density, compared to Kent, the South East and the UK.</li> <li>■ Economic activity rate, compared to Kent, the South East and the UK.</li> <li>■ Resident Occupation Group, compared to Kent, the South East and the UK.</li> <li>■ Earnings by residence and workplace, compared to Kent, the South East and the UK.</li> <li>■ Level of unemployment, compared to Kent, the South East and the UK.</li> <li>■ Level of qualification attainment, compared to Kent, the South East and the UK.</li> <li>■ Gains and losses of tourism floorspace.</li> <li>■ Location of tourism floorspace.</li> </ul>

SA Objective	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Gains and losses in retail floorspace and town centre uses.</li> <li>■ Progress in the delivery of the Dover Town Centre Strategy Plan and regeneration projects/Opportunity Areas.</li> <li>■ Town centre vacancy rates.</li> <li>■ Use of Article 4 directions in town centres.</li> <li>■ Loss and gains of local shops.</li> <li>■ Applications for changes to shop fronts.</li> </ul>
<p>SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.</p>	<ul style="list-style-type: none"> <li>■ Percentage increase in sustainable commuting.</li> <li>■ Number of electric vehicle charging devices in the District.</li> <li>■ Planning consents for home businesses.</li> <li>■ Public Rights of Way network gains and losses.</li> <li>■ Gains in pedestrian routes and cycle paths.</li> <li>■ Progress towards the delivery of strategic transport improvements for bus and rail.</li> <li>■ Section 106 and 278 Agreements signed relating to sustainable travel improvements.</li> </ul>
<p>SA 5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters.</p>	<ul style="list-style-type: none"> <li>■ Percentage of brownfield and greenfield development.</li> <li>■ Average density of residential development in the District by settlement.</li> <li>■ Average domestic water consumption in the District.</li> <li>■ Average commercial water consumption in the District.</li> <li>■ Development permitted in Coastal Change Management Areas.</li> <li>■ Water quality of the River Dour.</li> </ul>
<p>SA 6: To reduce air pollution and ensure air quality continues to improve.</p>	<ul style="list-style-type: none"> <li>■ Number of Air Quality Management Areas in the District.</li> <li>■ Exceedance episodes of key air pollutants.</li> <li>■ Exceedance episodes of national air quality objectives.</li> <li>■ Air quality exceedances and number of new Air Quality Management Areas declared.</li> <li>■ Percentage increase in sustainable commuting.</li> <li>■ Number of electric vehicle charging devices in the District.</li> <li>■ Number of electric vehicles as a percentage of total vehicles.</li> </ul>
<p>SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change.</p>	<ul style="list-style-type: none"> <li>■ Number of properties/areas at risk of flooding in the District.</li> <li>■ Number of applications approved contrary to Environment Agency advice.</li> <li>■ Number of windfall applications approved and refused on sites at risk of flooding.</li> <li>■ Number of qualifying permitted developments incorporating Sustainable Drainage Systems.</li> </ul>
<p>SA 8: To mitigate climate change by actively reducing greenhouse gas emissions.</p>	<ul style="list-style-type: none"> <li>■ Percentage reduction in CO<sub>2</sub> emissions.</li> <li>■ Number of energy-efficiency measures installed in homes in the District.</li> <li>■ Number of public electric vehicle charging devices in the District.</li> <li>■ Percentage of applications for new dwellings that demonstrate a 31% reduction below the Target Emission Rate or Future Homes Standard compliance.</li> <li>■ Percentage of applications for new dwellings and new non-residential buildings that demonstrate Building Research Establishment's Environmental Assessment Method (BREEAM) Very Good or Future Buildings Standard compliance.</li> </ul>

SA Objective	Proposed Monitoring Indicators
	<ul style="list-style-type: none"> <li>■ Percentage of new homes in the District with Energy Performance Certificates of A or B.</li> <li>■ Number of applications permitted for the generation of renewable or low carbon energy.</li> </ul>
<p>SA 9: To conserve, connect and enhance the District's wildlife habitats and species.</p>	<ul style="list-style-type: none"> <li>■ Impact on designated sites, including Special Area of Conservation, Special Protection Area and Ramsar sites</li> <li>■ Percentage Local Wildlife Sites in positive conservation management.</li> <li>■ Percentage Sites of Special Scientific Interest in favourable recovery.</li> <li>■ Additional land area designated and protected for biodiversity.</li> <li>■ Implementation of mitigation measures at the Thanet Coast and Sandwich Bay Special Protection Area.</li> <li>■ Ancient Woodland loss.</li> <li>■ Condition of Biodiversity Opportunity Areas.</li> <li>■ Condition of Nature Reserves and Local Wildlife Sites.</li> <li>■ Additional Tree Preservation Orders made.</li> <li>■ Biodiversity Net Gain, Habitat creation, restoration and management</li> </ul>
<p>SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.</p>	<ul style="list-style-type: none"> <li>■ Percentage of appeals dismissed on grounds of harm to a designated or non-designated heritage asset.</li> <li>■ Percentage of appeals dismissed on grounds of harm to a Conservation Area.</li> <li>■ Percentage of appeals dismissed on grounds of unjustified harm to assets of archaeological interest.</li> <li>■ Percentage of appeals dismissed on grounds of unjustified harm to a Registered Park and Garden.</li> </ul>
<p>SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.</p>	<ul style="list-style-type: none"> <li>■ Major development proposals approved within the Kent Downs Area of Outstanding Natural Beauty.</li> <li>■ Retail and main town centre uses permitted outside of town centre boundaries.</li> <li>■ Number of public realm, cultural and public art projects secured by a Section 106 Agreement.</li> <li>■ Development permitted in Coastal Change Management Areas.</li> <li>■ Gains and losses of tourism floorspace by area of District.</li> <li>■ Public Rights of Way network gains and losses.</li> <li>■ Gains in pedestrian routes and cycle paths.</li> <li>■ New development outside of defined settlements.</li> </ul>

# Chapter 9

## Conclusions and Next Steps

### Conclusions

- 9.1** This SA Report has been prepared to accompany the Regulation 19 Consultation for the Dover District Publication Local Plan. The SA has sought to identify significant effects emerging from the Publication Local Plan in line with the SEA Regulations.
- 9.2** The Publication Local Plan sets out a strategy that meets the District's housing needs as well as its aspirations for economic growth. A minimum of 10,998 new homes are to be delivered over the Plan period, which roughly equates to a 21.8% increase in the total number of homes in Dover District.
- 9.3** Housing growth is distributed across the District, with notable concentrations of allocations in the District's largest existing settlements, most notably Dover Town and neighbouring Whitfield. Other strategic housing allocations include large areas of land to the south of Aylesham and land in between Eythorne and Elvington.
- 9.4** Employment growth is generally focussed within established employment sites distributed across the District, with notable concentrations in Dover, Aylesham and the north of Sandwich.
- 9.5** The Publication Local Plan seeks to maximise the capacity of urban sites within the District's largest and most accessible settlements, but the scale of development needed has resulted in a need to also allocate a significant amount of greenfield land within the vicinity of the District's established centres of growth and farther afield in the countryside. This includes some large allocations within and adjacent to some of the District's smaller local centres and villages where the effects of the Publication Local Plan are likely to be particularly evident. Of the 69 sites allocated for housing in the Plan, 45 are greenfield and 24 are brownfield sites. In terms of the provision of new homes, 76.7% of the new homes proposed on site allocations in the plan are on greenfield sites, and 23.3% are on brownfield sites<sup>70</sup>.
- 9.6** Besides the significant benefits of delivering the District's housing and economic needs, the strategic policies delivering the majority of the planned growth set out plans to deliver a wide range of other benefits, such as the inclusion of new and improved facilities, services, green infrastructure and public transport networks.
- 9.7** The Publication Local Plan has a strong focus on mitigating and adapting to the effects of climate change over the Plan period and also requires excellent design sensitive to the District's natural, built and historic environment. However, the scale and distribution of the development proposed in the Publication Local Plan also has potential to have significant adverse effects on the District's natural resources, landscape and townscape, biodiversity and historic assets.
- 9.8** Generally, the growth strategy, spatial strategy and policies perform better than or similar to the reasonable alternatives tested, but several policy recommendations have been made to improve the sustainability performance of the Publication Local Plan.
- 9.9** Dover does not exist in isolation. Neighbouring Districts are also planning to deliver considerable amounts of development. This will result in in-combination effects, which will give the impression of increased urbanisation including the generation of additional traffic, and put pressure on resources, such as water, air quality, tranquillity and on ecological networks. It is therefore important that the local planning authorities continue to work closely together to make sure that their plans are co-ordinated to

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<sup>70</sup> In Chapter 5 of the SA, 75 residential site allocations are recorded. Reference is made here to 69 residential site allocations because Dover District Council took the decision to combine some of the sites appraised separately in the SA into one: (1) WHI001r and WHI008; (2) EYT003, EYT009 and EYT012; (3) SHE004r2 and TC4S082; (4) STM007 and STM008; (5) PRE003, PRE016 and PRE017; and (6) RIN002 and RIN004. The sites have been combined and each allocation policy appraised as one in Chapter 7 of the SA.

provide an integrated approach to maintaining and enhancing quality of life for all their residents, workers and visitors, and to ensure that a rich, high quality and resilient environment is created.

### Next Steps

**9.10** This SA Report will be available for consultation alongside the Publication Local Plan in October through to December 2022.

**9.11** After the public consultation, the Local Plan will be submitted to the Planning Inspectorate for examination.

LUC

September 2022

**Appendix A**  
**SA Consultation Comments**

Table A.1: Representation on Dover Local Plan SA Scoping Report

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
Ash Parish Council		
<p>In general, Ash Parish Council felt there was a lack of reference to the rural areas and villages in the Report, and that it was Dover-centric.</p> <p>Their specific comments are made in relation to the following parts of the Scoping Report:</p>	General comment	The SA Scoping Report has drawn on all up-to-date and readily available evidence in establishing the baseline. The SA Framework will be applied consistently to all policies and site allocations in the new Dover Local Plan.
<p>Ash Parish Council acknowledge bullet point 2 of this paragraph, which states that the updated NPPF (due to be published in Spring 2018) will contain a new policy that seeks to increase the density of development around commuter hubs. Ash Parish Council notes however, that it will be difficult to integrate an increased density in rural areas which have railway links and may be seen as 'commuter hubs', with existing rural communities than those communities which are urban. They question whether this is reflected in the SA assessment criteria.</p>	Introduction – paragraph 1.23	With regard to paragraph 1.23, Table A1.1 sets out criteria for assesses the proximity to a range of local services and facilities, not just railway links.
<p>This chapter identifies national policies regarding health issues, but does not suggest how health issues will be addressed through the Local Plan. For example, bullet point 5 of para 2.49 which outlines how issues of obesity will be tackled, is very generalised. Additionally, the chapter does not acknowledge the problems associated with under-provision of health facilities in rural communities and the fact that people must travel by private transport to reach them. Further, it does not appear that this issue has been considered with regard to large housing developments being allocated to rural areas.</p>	Chapter 2 – Population growth, health and wellbeing	With regard to Chapter 2, paragraph 2.49 sets out the sustainability issues and highlights the opportunities for the Local Plan to manage such issues. The new Local Plan has yet to be drafted. The first bullet references pressures on key services and facilities, including health and social care and highlights the opportunity the new Local Plan presents to manage these pressures. The last bullet references capacity issues in the District's primary schools and highlights the need to meet local needs through improvements to existing facilities and infrastructure. This is likely to include expansions and improvements to existing facilities and new facilities. Both apply to everywhere in the District.
<p>With regard to education capacity issues in the District, expansion is unlikely to address the increased education need because it will extend the travel time for students in rural communities, as well as increasing the need for them to use private transport due to a lack of sufficient public transport.</p>	Chapter 2 – Population growth, health and wellbeing – paragraphs 2.32 and 2.49 (bullet point 7)	With regard to paragraph 2.32, the paragraph describes Kent County Council's strategy.

Appendix A  
SA Consultation Comments

Publication Dover District Local Plan (Reg 19)  
September 2022

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
This paragraph states that the Local Plan will 'improve the prosperity of the rural economy'. Could there be consideration of also improving the sustainability of rural employment?	Chapter 3 – Economy – paragraph 3.18	With regard to paragraph 3.18, the word 'sustainability' has been added to the first bullet.
No reference is made to Manston Airport.	Chapter 4 – Transport connections and travel habits – paragraph 4.6	With regard to paragraph 4.6, the document 'Lighting the way to success: The EKLSP Sustainable Community Strategy' does not discuss Manston Airport in detail. The SA Scoping Report does, however, include a short discussion on Manston Airport in paragraph 2.48. An additional reference has been added to Chapter 4.
No mention of how rural transport can be supported. Furthermore, this issue is not mentioned later in the Report, in relation to rural communities coping with their ageing populations and the decline of public transport.	Chapter 4 – Transport connections and travel habits – paragraph 4.10	With regard to paragraph 4.10, paragraph 4.27 makes direct reference to the elderly becoming increasingly reliant on local bus services and the need to ensure a good range of sustainable transport links are provided across the District – this includes rural areas.
Ash Parish Council would like to comment on the historic evidence base regarding Anglo-Saxon burials/finds in Ash (if appropriate) at a later point in the coming consultations. They would also like to include detail on the Richborough Fort in their comment(s).	Chapter 8 – Historic environment – paragraph 8.15	Ash Parish Council's wish to comment on the historic evidence base regarding Anglo-Saxon burials/finds and Richborough Fort is noted.
<b>Environment Agency</b>		
The phrase "a shortfall in demand" would sound better as "a shortfall in supply relative to demand".	Chapter 5 – Air, land and water quality – paragraph 5.40	With regard to paragraphs 5.40 and 5.47 (bullet point 4), the paragraphs have been amended as suggested.
Same as above.	Chapter 5 – Air, land and water quality – paragraph 5.47	With regard to paragraphs 5.40 and 5.47 (bullet point 4), the paragraphs have been amended as suggested.
With regard to the sentence "Some areas within the Dover District have been classified by the Environment Agency as at Moderate or Serious Water Stress", this is true of individual water bodies, but water companies are able to move water around their networks so that the status of individual water bodies is only indirectly relevant to supply. Water companies across the whole of south-east England (including Affinity and Southern Water) have been classified as under Serious Water Stress <sup>7</sup> , Table 1 of	Chapter 5 – Air, land and water quality – paragraph 5.41	With regard to paragraph 5.41, the paragraph has been updated accordingly.



Appendix A  
SA Consultation Comments

Publication Dover District Local Plan (Reg 19)  
September 2022

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
<a href="https://www.gov.uk/government/publications/water-stressed-areas-2013-classification">https://www.gov.uk/government/publications/water-stressed-areas-2013-classification</a> .		
With regard to the sentence “Source Protection Zones 2 and 3 are located within the District”, there are also Zones 1, which are the most sensitive. These protection zones are designated to protect sources of supply rather than “rivers and aquifers” from pollution.	Chapter 5 – Air, land and water quality – paragraph 5.46	With regard to paragraph 5.46, the paragraph has been reworded to include reference to Source Protection Zone 1, and the role Source Protections Zones play in protecting the District’s water supply from pollution.
The intention to “minimise the amount of inappropriate development” in these zones sounds insufficiently strong.	Chapter 5 – Air, land and water quality – paragraph 5.47	With regard to paragraph 5.47 and associated appraisal question SA 5.4, both have been reworded to direct inappropriate development away from Source Protection Zones.
Supporting Appraisal Question SA 5.4 (Tables 5.1 and 10.1) – Same as above.		With regard to paragraph 5.47 and associated appraisal question SA 5.4, both have been reworded to direct inappropriate development away from Source Protection Zones.
This objective should make it clear that development should be avoided in flood risk areas. The Environment Agency suggests the following wording: “To avoid placing people and property in areas of flood risk. Where, exceptionally, it is necessary it must be safe without increasing flood risk elsewhere, taking into account the impact of climate change” and “SA 9.1: Does the Plan avoid adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?” The Environment Agency questions the sufficiency of this question, given that ‘adverse effects’ are bound to come from development and use of sites. They suggest that reference should be made to the mitigation or offsetting of harm when unavoidable harm is likely to occur.	SA Objective 7 (Tables 10.1)	<p>With regard to SA Objective 7, Supporting Appraisal Question 7.1 has been amended to read: ‘Does the Plan avoid placing people and property in areas of flood risk, or where it exceptionally does, is it safe without increasing flood risk elsewhere, taking into account the impact of climate change?’</p> <p>With regard to SA Objective 9, Supporting Appraisal Question 9.1 has been amended to read: ‘Does the Plan avoid, mitigate and offset adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?’</p> <p>With regard to Supporting Appraisal Question 9.3, reference has been made to Kearsney Abbey, Russell Gardens and Bushy Ruff because the Green Infrastructure Strategy identifies their importance (and appeal) to the public. However, it is noted that other sites may be of equal importance. Therefore Supporting Appraisal Question 9.3 has been revised to read: ‘Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations’.</p>
The following watercourses have been excluded from this section: the North Stream, South Stream, Delf, Penfield Sewer, Brook Stream and the Minnis	Chapter 5 – Air, land and water quality – paragraph 5.38	With regard to paragraph 5.38, the paragraph has been amended to include reference to all main rivers.

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
<p>Sewer. The Environment Agency questions whether there is some confusion over the meaning of 'main river'. Clarification required.</p>		
<p>'Fowlmean County Park' should be 'Fowlmead Country Park'.</p> <p>Lastly, from a groundwater and contaminated land perspective this document covers the key aspects for the Environment Agency, including brownfield site developments and capacity in sewer systems, especially around Whitfield.</p>	<p>Chapter 7 – Biodiversity – paragraph 7.25</p>	<p>With regard to paragraph 7.25, the paragraph has been amended.</p>
<p>Highways Agency</p>		
<p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the SRN covering Dover District, namely the A2 and A20.</p> <p>Highways England support SA Objective 4, namely "To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion".</p> <p>Highways England supports the fact that the sites will be considered cumulatively, as well as in their own right.</p> <p>Lastly, Highways England notes that they wish to work with DDC regarding the production of the necessary evidence base. They stand ready to provide assistance and commentary throughout the process.</p>	<p>SA Objective 4 (Tables 10.1)</p>	<p>Noted.</p>
<p>Historic England</p>		
<p>We are content that the Scoping Report for Dover adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the local plan.</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may</p>	<p>General comment</p>	<p>Noted.</p>

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
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.		
<b>Kent County Council</b>		
Reference should be made to the Kent Design Guide , with a focus on section 1.4 ('Sustainability').	Chapter 4 – Transport connections and travel habits	With regard to Chapter 4, reference has now been made to the Kent Design Guide, with a focus on section 1.4.
<p>With regard to minerals safeguarding, KCC notes that the Scoping Report correctly acknowledges the safeguarded minerals present within the District, as outlined in Policy CMS 5 of the adopted Kent Minerals and Waste Local Plan (KMWLP). It also makes appropriate reference to the NPPF and the KMWLP with regard to ensuring that mineral resources are not needlessly sterilised by other forms of development, whilst also correctly identifying the valuable safeguarded minerals reserves.</p> <p>With regard to waste management facilities, the Scoping Report recognises the importance of waste management facilities and ensuring that their continued lawful operation is not compromised by future development, as outlined in Policy CSW 16 of the KMWLP. The Scoping Report also correctly recognises that waste management facilities are important to maintaining net self-sufficiency and ensuring that development is sustainable. KCC considers that the approach to sustainable waste management is in accordance with the sustainable waste management and waste facility safeguarding objective of the KMWLP.</p> <p>Overall, KCC is satisfied with the inclusion of minerals and waste facility safeguarding within the Scoping Report. The approach is in accordance with the principles of sustainable waste management, facility safeguarding, mineral safeguarding and sustainable supply objectives of the KMWLP.</p>	Chapter 5 – Air, land and water quality	KCC's support for Chapters 5 and 6 is noted.
KCC notes that the Scoping Report includes an appropriate assessment relating to flood risk. The Scoping Report also appropriately notes that the assessment is site specific and indicates that sustainable drainage systems may be implemented on a site by site basis during planning application processes.	Chapter 6 – Climate change adaptation and mitigation	KCC's support for Chapters 5 and 6 is noted.

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
<p>KCC recommends the following text is added to the 'International' section: "Valletta Treaty (1992): Formerly the European Convention on the Protection of the Archaeological Heritage (Revisited). Aims to protect the European archaeological heritage 'as a source of European collective memory and as an instrument for historical and scientific study'".</p> <p>With regard to the 'National' section, KCC acknowledges that the proposed revisions to the NPPF have now been published.</p> <p>With regard to the 'Sub National' section, KCC recommends the inclusion of the following paragraph: "The Kent Environment Strategy (2016): Seeks to build on the previous Environment Strategy to learn from experience, evaluate progress, bridge gaps in knowledge and deliver activities that have positive benefits for the environment, health and the economy".</p> <p>With regard to the 'Current baseline' section, the text only refers to designated heritage assets. However, as the Dover Heritage Strategy already acknowledges, the vast majority of Dover's heritage assets are not designated (at the time of publication of the Dover Heritage Strategy more than 6,000 non-designated assets were identified). Some of these will be of similar significance to the designated assets. Indeed the non-designated assets produce most of the District's historic character and include many of the assets most valued by local people. KCC therefore recommends that the Scoping Report should include a section on Dover's non-designated assets, to include: (1) archaeological sites and features; (2) historic buildings; (3) the historic landscape; and (4) maritime features.</p> <p>The inclusion of non-designated sites is particularly important and indeed, this is evident from the prominent focus in the draft appraisal questions.</p> <p>The text should also mention the Kent Historic Environment Record (HER) maintained by KCC. This is the main source of baseline information on Kent's heritage assets, both designated and non-designated.</p> <p>A key source of baseline heritage information could be the Local List of Heritage Assets that was proposed to be compiled as a recommendation of the Dover Heritage Strategy.</p>	<p>Chapter 8 – Historic environment</p>	<p>With regards to Chapter 8, reference to the Valletta Treaty and the Kent Environment Strategy has now been added. The 'Current baseline' section in Chapter 8 has also been updated to include reference to non-designated heritage assets and KCC's Historic Environment Record. Where possible, all site options have been assessed by Council officers to determine the likely effects of development on significance and setting of designation and non-designated historic assets, including historic assets at risk.</p>

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
<p>For any proposals located within farmsteads, the County Council recommends reference is given to the recent farmstead guidance prepared by Historic England and the Kent Downs AONB Unit.</p>		
<p>Chapter 5 Chapter 9 – KCC notes that, at present, this section does not describe the historic nature of the Dover landscape. KCC recommends that DDC refers to the Kent Landscape Assessment , which includes a broad consideration of the history of the landscape. However, to fully comprehend how the landscape has developed and to identify those aspects which make it unique, a more detailed assessment is needed. The Kent Historic Landscape Characterisation (2001) is a tool for understanding this historic context and should be used at a strategic level to inform decisions taken regarding the landscape character of Dover. Ideally this county level study should be deepened to be more relevant at the District and local level (KCC is happy to discuss further with DCC as to how this can be taken forward).</p> <p>The Kent Historic Landscape Characterisation should be mentioned in this review of baseline landscape information. It is difficult to address the heritage aspects of the Supporting Appraisal Questions (11.1 and 11.2) if this information is not included.</p>	<p>Chapter 9 – Landscape</p>	<p>With regard to Chapter 9, reference is already made to the Kent Landscape Assessment. Reference to the Kent Historic Landscape Characterisation Report has, however, been added to the chapter. As mentioned in the Report, the District is in the process of updating its Landscape Character Assessment to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.</p>
<p>Heritage assets include non-designated heritage assets, as stated in the Dover Heritage Strategy (paras 2.1, 3.5 and 3.6). As such, KCC suggest that the 'Assessment Note' for these criteria be modified to the following: "Heritage assets include Scheduled Monuments, Protected Wreck sites, Battlefields, Listed Buildings Grades I and II*, Registered Parks and Gardens Grade I and II*, World Heritage Sites, Conservation Areas and non-designated heritage sites".</p> <p>Further, using proximity to heritage assets as a screening mechanism for site allocations will only address some heritage issues. It is true that archaeological remains are less likely to be affected as distance to the development increases, but the setting of heritage assets can nonetheless be significantly affected even at a distance. The text identifies this to some extent, but suggests that longer screening distances will only be needed outside existing settlements. In reality, some of Dover's most important assets, such as Dover Castle or the District's historic churches, are located in urban areas and could be impacted negatively by poorly designed, large or</p>	<p>Table A1.2 – Environmental Site Assessment Criteria</p>	<p>With regard to the site assessment criteria set out in Table A1.2, the criteria facilitate an initial high-level assessment of site options but have been supplemented by Council assessments where possible.</p>

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
<p>tall developments. The site assessment criteria defined in Table A1.2 therefore needs to include a more explicit requirement that new development will not impact negatively on the setting of heritage assets.</p> <p>It should also be noted that as part of the Dover Heritage Strategy all the site allocations were assessed for their relevance against the heritage themes in the Strategy. This assessment should be considered as part of the more general site assessment proposed in this report.</p>		
Kent County Council Public Rights of Way (PROW) and Access Service		
<p>With regard to the 'Policy Context' sections throughout this report, reference should be made to the Rights of Way Improvement Plan (ROWIP), which aims to address the future needs of Kent's PROW users through the delivery of a range of actions over the next decade. The vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. The inclusion of a reference to the ROWIP will enable the successful joint partnership working to continue to make improvements to Dover's PROW network. Joint delivery of the strategic plan will ensure significant benefits whereas its omission could result in significant loss of access to additional funding and opportunities.</p>	Policy context	The policy context sections to Chapters 2 and 4 have been updated to include reference to the Kent ROWIP.
<p>Para 2.42 – This paragraph does not make reference to the England Coast Path or the existence of Coastal Access rights within the District. The England Coast Path is a new National Trail walking route that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. Following the introduction of the Marine and Coastal Access Act 2009, the County Council has been working in partnership with Natural England to establish the Kent stretches of the England Coast Path.</p> <p>The Service also notes the importance of protecting and enhancing public rights of way and access with regard to future site allocations included within the Local Plan.</p>	Chapter 2 – Population growth, health and well-being	With regard to paragraph 2.42, the paragraph has been updated to include reference to the England Coast Path and access rights.
The Coal Authority		

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
There are 19 recorded mine entries within the Dover area. The Coal Authority therefore recommends that a criterion is included within the assessment framework that reviews the area under consideration against the Coal Authority's downloadable data, which identifies those areas within Dover that are at risk from past coal mining activity. This would ensure that any coal mining features present on a site which may impact the developable area, are identified at an early stage.	Table A1.2 – Environmental Site Assessment Criteria	A new site assessment criterion has been added to take account of Coal Authority 'mine entries', which will inform the SA of site allocation options.

**Table A.2: Representations on Draft Dover Local Plan SA Report**

Consultation Comment	SA Report Reference	Response/Action Taken
SA23 (Natural England)		
We advise that the following is revised: “SA 9.1: Does the Plan avoid, mitigate and offset adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?” We advise that the term offset should be removed.	Chapter 3 – SA framework	SA Objective 9.1 edited.
We advise that biodiversity net gain targets are included to provide evidence of a measurable uplift in biodiversity through the execution of the Local Plan.	Appendix B – Biodiversity policy context	Reference to draft national biodiversity net gain target added.
We further advise that water use targets in line with our recommendations above are included in the SA.	Appendix B – Biodiversity policy context	Reference to future national water use target added.
SA25 (Historic England)		
We are content that the sustainability appraisal report for Dover local plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	General comments	Noted.
DLP1539 (Environment Agency)		

Appendix A  
SA Consultation Comments

Publication Dover District Local Plan (Reg 19)  
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Consultation Comment	SA Report Reference	Response/Action Taken
D5 reiterates the shortfalls in demand to 2031.	Table 3.1 – Key sustainability issues	Noted.
Appendix B para B.145 reiterates the statistics from the outdated Kent Environment Strategy.	Appendix B – Water quality	The most up to date evidence available was relied on in the production of Appendix B. The references and associated facts and figures in Appendix B will be updated through subsequent iterations of the SA.
The reasoning behind the domestic water efficiency standard – presented in paras 6.84-6.87 is well argued.	Chapter 6 – SA of water efficiency policy options	Noted.
DLP1819 (Highways England)		
Strategic highway infrastructure policy option B is likely lead to a situation where other development coming forward, not allocated, would be exempt from contributions (Para 6.413). Highways England is supportive of this policy towards the A2 and will work with Dover Council as part of the RIS3 programme for improvements on the A2.	Chapter 6 – SA of transport and infrastructure policy options	The Council has elected to include a policy supporting upgrades to the A2 because it represents the option which is likely to yield the greatest financial support for the strategic infrastructure project.
With regards to Highway network and safety, the Council has chosen to focus on a flexible approach to Transport Assessments and Travel Plans in order to force the onus on developers to prove their management of the highway network and overall impact. Highways England agrees with the flexible approach indicated in Option A and chosen within the DDLP.		Noted.
The Council is not seeking to introduce CIL as a financial obligation, but proceed with utilising existing S106 and S278 Agreements as mechanisms for collecting developer contributions. Highways England agrees with this approach.		Noted.
With regards to the Strategic Highways Infrastructure, the SA notes in para 6.407 that the Council considered three options. Option A was selected as it was likely to offer the greatest financial support for upgrades to the A2 as a strategic infrastructure project. Assessment by both Dover Council and Highways England will provide the final test of the proposals and determine appropriate mitigation needs. For this reason, Highways England is confident		Noted.



Consultation Comment	SA Report Reference	Response/Action Taken
<p>that the potential negative effects of the DDLP policies can be effectively managed throughout the life cycle of the plan.</p>		
<p>With regards to Sustainable Travel and the policies outlined within the DDLP, the SA notes that while sustainable travel is encouraged and supported in the DDLP with improved connection for public transport and active travel (cycling and walking), a minor adverse effect is also recorded for improvements on the SRN. Improvements to the SRN are likely to increase capacity and improve journey time reliability, which by their very nature, may attract more private vehicle use vs lowering overall car use. This is an accepted side effect of improvements to any road network and as such is not considered to have a significant impact. What is more important is that the attractiveness of the public transport modes and active cycle/walking links are designed in such a way as to make the choice of a car the last consideration. Prioritising other modes over that of the vehicle is likely to encourage a significant mode shift. As such, Highways England has no concerns with regards to how sustainable travel is managed within the DDLP.</p>	<p>Chapter 6 – Secondary, cumulative and synergistic effects</p>	<p>The minor negative effect recorded for SA Objective 4 (sustainable travel) is acknowledged in recognition of the fact that a significant number of homes (1,875) were to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Draft Local Plan's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available. This judgement also acknowledges that considerable investment in the strategic highway network is planned over the Plan period.</p>
<p>SA12, SA13 (Campaign To Protect Rural England (CPRE))</p>		
<p>D3 sets out that the Plan provides an opportunity to set out measures to mitigate exceedances in the AQMAs without inhibiting the need for the District to grow. It will be important that allocations, both individually and cumulatively, do not increase air pollution resulting in the need for the establishment of new AQMA.</p>	<p>Table 3.1 – Key sustainability issues for Dover District</p>	<p>Noted. It is considered that this issue is covered through the existing wording.</p>
<p>E4 notes that the District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Whilst adaptation and mitigation will be part of the solution the location of new development can either help or hinder. The SA should recognise that a sustainable pattern of development will also help address the climate change challenge. The sustainability framework (Table 3.2) should be enhanced to</p>		<p>Additional wording added to Tables 3.1 and 3.2 to reference the importance of a sustainable pattern of development in combating climate change.</p>

Consultation Comment	SA Report Reference	Response/Action Taken
ensure that the Plans location of new development supports a sustainable pattern of development for existing and future residents.		
SA24 (Southern Water)		
<p>Southern Water have commented that the following points in the Sustainability Appraisal look to highlight foul capacity issues in the Dover District Area (4.77, B.154, C.92, C.94, C.95, C.103). In respect of the above statements, Southern Water are currently carrying out a project in Whitfield to overcome the foul issues that would be caused by increased housing during the timeline of the Local Plan. The aim of the project is to provide storage upstream of Sandwich Road pumping station that will prevent the flooding of the local properties. The flooding of local properties has occurred since 2014 and has recently been exacerbated by the new development in the area as mentioned in the paragraphs noted above. At the time the project was prepared, the area in Whitfield was projected to experience growth of 5,750 properties by 2035, taking the overall number of properties draining to Sandwich Road pumping station to 7,453. We have calculated as part of the project that 1,200m<sup>3</sup> of storage will be required for these 7,453 properties to prevent further flooding of the network. This storage has taken the form of a shaft, and it is intended that this storage will then be converted into an oversized wet well for a long term solution which consists of pumping approximately 12km to Broomfield Bank WTW. Therefore the foul network should not be seen as a blocker to development in the Whitfield area and Southern Water would request for this to be noted within the draft sustainability report.</p>	Appendix B – Water quality	Reference to Southern Water’s work at Whitfield has been added to 4.77, Appendix B and C.
DLP3569 (Savills)		
<p>There are a number of areas of the SA that we consider flawed as there is limited information available to detail how the site has been assessed against each criteria. Further detail is therefore required to outline how the SA corresponds with the draft strategic or development management policies. Savills has provided comments on the SA, in relation to the promotion at the Land east of Northbourne Road in the context that the present version applies to the reduced allocation set out within GTM003, rather than the entirety of the promoted site. These comments should be considered as part</p>	Site GTM003 SA findings.	<p>Justification for effects identified for the site at Great Mongeham can be found in paragraphs 5.36 and 5.38 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site option has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>of any revision to the SA, should the allocation be expanded across the wider site.</p> <p>The SA States that the proposal will result in significant adverse impacts to resources, as well as minor negative effects to the Historic Environment, Climate Change, Transport and Access to Amenities. This is not considered justified as there are multiple ways to ensure or mitigate these impacts, which have not yet been accounted for in the SA.</p> <p>In accordance with this, Table 4.2 sets out the proposed changes to the SA findings as suggested by Savills and following the production of further technical work.</p> <p>The SA does not account for the relative sustainability of the site, specifically when considering its close proximity to local bus services and the wider Great Mongeham settlement.</p> <p>The proposed SA findings demonstrate the potential benefits of the wider proposal on each objective, including the potential for biodiversity net-gain across the site and the use of renewable technology on the site to promote resilience across the site. As such, it is considered that the proposal will be able to enhance the baseline levels on the site.</p> <p>Comments made in the SA on site GTM003 are not justifiable as all can be mitigated against.</p>		<p>judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>Site GTM003 has been allocated in the Draft Local Plan Site Allocations Policy 1: Housing Allocations, which contains reference to appropriate mitigation measures. The significant effects of Site Allocations Policy 1 are set out in Table 6.4 of the SA Report. Accompanying justification for the effects identified are set out in paragraphs 6.183 to 6.245.</p> <p>Paragraph 6.248 states with regards to the significant negative effects identified for SA Objective 5 (natural resources), as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further. Similarly, other potential environmental adverse effects identified against SA Objectives 2 (health and well-being), 4 (travel) 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations.</p> <p>Table 6.11 of the SA Report summarises the negative effects that could arise from the implementation of the individual Draft Local Plan policies in relation to each SA objective and how these are likely to be mitigated by other policies in the Draft Local Plan.</p> <p>Further information with regards to the appraisal of each site option will be provided in the SA Report accompanying the Publication Local Plan.</p>
SA28 (Barratts)		
<p>Of the options considered, Barratt consider DDC should proceed with spatial options A, B or E whereby development is distributed more evenly across the district in areas on suitable and achievable sites that can be delivered in areas where new homes and infrastructure is required. This is preferable to the proposed approach within the Regulation 18 Local Plan which seeks to continue a focus of development in Dover Town. It is also recommended that DDC seek to maximise growth and move forward with an ambition to deliver the highest growth option to boost significantly housing in accordance with</p>	<p>Chapters 4 and 6 – Growth/spatial options SA</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>NPPF paragraph 59. Recommendation: DDC proceed with spatial options A, B or E and seek to deliver the highest growth option.</p>		<p>options had not been defined at this stage in the plan-making and associated SA process.</p> <p>Paragraph 6.143 sets out the councils reasoning behind the selection of the preferred housing growth option: The minimum objectively assessed housing needs of the District in line with Growth Options 1 or 2 using a spatial strategy guided by the District's settlement hierarchy (Spatial Option C) but also avoiding the District's key environmental constraints (Spatial Option D). To ensure deliverability the spatial strategy is also influenced by site availability (Spatial Option A). This combination of growth and spatial options is considered to be consistent with the guidance set out in the Strategic Housing Market Assessment (2017) which concludes that a cautious approach is needed to the housing target unless significant economic interventions, such as regeneration.</p>
<p>SA3 (Member of the Public)</p>		
<p>RIN004, on the former Ringwoud Alpines site, and the associated RIN002, have both been incorrectly described in the HELAA as brownfield/part brownfield historically. Furthermore, site RIN004 should be record as lying within the Kent Downs AONB, and that a traffic assessment would be required. It seems there has been an error or accidental omission as these points, as these are now missing from the current Site Allocations Policy 1 Non-Strategic Housing Allocations. This should be corrected.</p>	<p>Site RIN002 and RIN004 SA findings.</p>	<p>The SA of site options against SA objective 5 (Resources) focusses on the agricultural land classification of land and its environmental quality rather than its greenfield or brownfield status. The SA of site options against SA objective 11 (Landscape) draws on the Council's HELAA Landscape Environment Assessment – Landscape sensitivity Assessment. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p>
<p>SA8, SA9 (Member of the Public)</p>		
<p>Table 4.2 incorrectly assesses the impact of growth scenario C. Each category needs to be reassessed to accurately reflect detrimental impact of this growth option.</p>	<p>Table 4.2 – Growth/spatial options SA findings</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial options had not been defined at this stage in the plan-making and associated SA process.</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>Table fails to correctly assess the impacts of the development of sites EAS002 and EAS012 on Travel, Employment, Health and Wellbeing, Air Pollution and Natural Environment. Reassessment is required to take account of these impacts.</p>	<p>Table 5.4 – Eastry residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Eastry can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>SA11 (Member of the Public)</p>		
<p>Objection to further housing growth in Deal. Sites DEA020 and DEA008 are identified as remote options in the Plan, but in the same breath these sites are put forward for consideration. The weakest performing site options are located in generally the remotest locations south of Walmer (WAL002) and west of Sholden (DEA020 and DEA008) where there is generally greater scope for significant adverse effects on the Districts environment. I would request, these sites are removed from the plan.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>SA16, SA17, SA18, SA19 (Member of the Public)</p>		
<p>Objection to the allocation of site SHE003 on the grounds of A) Impact on narrow lanes, particularly those without pavements on Westcourt Lane and Church Hill. B) More traffic congestion. Traffic will also be aggravated by major developments in Eythorne/Elvington. C) Inadequate access points to new sites and especial problems for emergency vehicle access. D) Impact on natural habitats for flora and insects as well as roadside nature reserves. E) Increased risk of flooding F) Harm to villages local distinctiveness and quality of life. G) Lack of infrastructure for schooling and access to GPS H) Characterisation of Shepherdsweil in the same settlement hierarchy as</p>	<p>Table 5.4 – Shepherdsweil with Coldred residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Shepherdsweil with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>Wingham, St Margarets and Ash, villages with considerably more facilities. I) Failure of DDC to give communities adequate time to consider the plan with the eight weeks consultation taking place in a pandemic lockdown.</p>		<p>development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>Objection to the allocation of site SHE004 on the grounds of A) More traffic and congestion problems in the village B) Inadequate access points to new site and problems for emergency vehicle access C) Harm to villages local distinctiveness and quality of life D) Harmful impact on landscape and appearance of countryside. Damage to distinctive and unique views across east Kent. Development close to North Downs Way, much used by walkers, which provides villagers particularly young, older people and dog walkers safe access to the countryside without danger from vehicles E) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes, especially those without pavements on Cox Hill. Increased danger to pedestrians and cyclists. B) More traffic and congestion. C) Impact on natural habitats, roadside nature reserves, flora and insects. D) Increased risk of flooding. E) Harm to villages quality of life. F) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes B) More traffic and congestion C) Inadequate access points to new site D) Impact on natural habitats for flora and insects and nature reserve E) Harm to villages local distinctiveness and quality of life F) Failure of DDC to give communities adequate time to consider the plan during a pandemic lockdown.</p>		
<p>SA20 (Member of the Public)</p>		
<p>With regards to DM Policy 11, the consultee raises that existing developments in the District is of the same bland design. Local Plan should promote more sustainable housing developments that offer exciting environmentally sensitive designs. Local Plan should require all new housing</p>	<p>SA of DM Policy 11 (Type and Mix of Housing)</p>	<p>A record and appraisal of the reasonable alternatives considered for DM Policy 11 can be found in paragraphs 6.159-6.162. The reasons for the selection of the preferred option can be found in paragraph 6.163. Table 6.4 sets out the likely effects of DM Policy DM 11. Justification for the two</p>

Consultation Comment	SA Report Reference	Response/Action Taken
to be built to the governments proposed 2025 Green Standards as a minimum.		significant positive effects identified can be found in paragraphs 6.184 and 6.197.
SA22 (Member of the Public)		
<p>Objection to the allocation of sites in Sheperdswell, in particular SHE003. The objection cites a number of sustainability issues that make the sites unsustainable: The infrastructure and road network in the village will not be able to cope with additional housing. The roads are si-gle width country lanes – totally unsuitable for the massive increase in traffic from 100+ new homes. There are no footpaths and no possibility or space for any. Very dangerous and the plans do not address this in any way. Poor access to public transport, will lead to congestion. Water and sewage systems are also cited as under pressure. Suggests alternative locations where there is the road, water, education and health infrastructure to accommodate growth.</p>	Table 5.4 – Shepherdswell with Coldred residential site options SA findings	<p>Justification for effects identified for the sites options in and around Shepherdswell with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA5 (Member of the Public)		
<p>Objection to the allocation of site WAL002 on the grounds that the gas network is problematic, the drains block regularly and the Glenn road is not suitable for more traffic.</p>	Table 5.2 – Deal residential site options SA findings	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA15 (Member of the Public)		
<p>Objection to the allocation of site WAL002 on the grounds that A) This is an area of great natural beauty and the development would seriously damage the landscape and wildlife habitats in the area. B) This land only has one road leading to it and has flooded in the past.</p>	Table 5.2 – Deal residential site options SA findings	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p>

Appendix A  
SA Consultation Comments

Publication Dover District Local Plan (Reg 19)  
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Consultation Comment	SA Report Reference	Response/Action Taken
		<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA21 (Member of the Public)		
<p>The consultee suggests the spatial options should take into account whether an area has reached its maximum housing figure, advocating that is not always reflected in a population based approach. Opposed to further rural housing growth on the grounds that A) Existing infrastructure cannot cope with additional housing, B) Impact on tourism – adding more housing to existing villages will destroy the rural image tourists enjoy for walking and cycling.</p>	<p>Definition of reasonable spatial options for SA – Paragraph 4.27</p>	<p>The spatial options identified have been defined based on a general assumption that additional growth will be supported by new and improved infrastructure, services and facilities to accommodate the existing and future needs of communities.</p>
SA26 (Member of the Public)		
<p>Table 5.2 Deal residential site options SA Findings (Chapter 5): Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b, SA6, SA3.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>
SA27 (Member of the Public)		



Consultation Comment	SA Report Reference	Response/Action Taken
<p>Table 5.2 Deal residential site options SA Findings (Chapter 5) Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b,SA6,SA3.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>

## **Appendix B**

### **Detailed Sustainability and Policy Context**

## Population growth, health and wellbeing

### Policy context

#### International

**B.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998):** establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

**B.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002):** sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

#### National

**B.3 National Planning Policy Framework (NPPF) (2021)<sup>1</sup>** contains the following:

- The NPPF promotes healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles.
- One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”.
- Local plans should “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.
- “A network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”.
- “Good design is a key aspect of sustainable development” and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. Planning decisions should result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raises the standard more generally in the area, and addresses the connections between people and places.
- The promotion of retaining and enhancing of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
- Developments should create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.
- There is a need to take a “proactive, positive and collaborative approach” to bring forward development that will “widen choice in education”, including sufficient choice of school places.
- Paragraph 73 states that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities”. As such the NPPF provides support for the identification of locations which are suitable for this type of development in a manner which would help to meet needs identified in a sustainable way.

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<sup>1</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

**B.4** The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book**<sup>2</sup> provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation

**B.5 National Planning Practice Guidance (NPPG) (2021)**<sup>3</sup>: contains the following: Local planning authorities and relevant organisations should engage to improve health and wellbeing, and so the provision of health infrastructure is considered in local and neighbourhood plans and in planning decision making.

**B.6 National Design Guide (2021)**<sup>4</sup>: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**B.7 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013)**<sup>5</sup>: warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

**B.8 Fair Society, Healthy Lives (2011)**<sup>6</sup>: investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities". **Marmot Review 10 Years On (2020)**<sup>7</sup> revisits Fair Society, Healthy Lives. It found that, since 2010, life expectancy in England has stalled, which suggests society has stopped improving. In addition, there are marked regional differences in life expectancy – the more deprived the area, the shorter the life expectancy. Mortality rates are increasing in those aged 45-49, child poverty has increased and there is a housing crisis and rise in homelessness.

**B.9 Planning Policy for Traveller Sites (2015)**<sup>8</sup>: sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community

**B.10 Planning for the Future White Paper (2020)**<sup>9</sup>: sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them.
- Digitising plan-making and development management processes.
- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

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<sup>2</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2018). Housing Delivery Test Measurement Rule Book. (see <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>)

<sup>3</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2022). National Planning Practice Guidance. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

<sup>4</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

<sup>5</sup> Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>)

<sup>6</sup> The Marmot Review (2011). Fair Society, Healthy Lives. (see <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>)

<sup>7</sup> Institute of Health Equity (2020). Health Equity in England: The Marmot Review 10 Years On. (see <https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on>)

<sup>8</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2015). Planning policy for traveller sites. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf))

<sup>9</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2021). (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf))

**B.11 The Levelling Up and Regeneration Bill (2022)**<sup>10</sup> sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.

**B.12** Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

**B.13 Laying the foundations: a housing strategy for England (2011)**<sup>11</sup>: aims to provide support to deliver new homes and improve social mobility.

**B.14 Homes England Strategic Plan 2018 to 2023 (2018)**<sup>12</sup>: sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

**B.15 The Housing White Paper 2017 (Fixing our broken housing market) (2017)**<sup>13</sup>: sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

**B.16 Public Health England, PHE Strategy 2020-25 (2019)**<sup>14</sup>: identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

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<sup>10</sup> Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

<sup>11</sup> HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7532/2033676.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf))

<sup>12</sup> Homes England (2018) Strategic Plan 2018 to 2023. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752686/Homes\\_England\\_Strategic\\_Plan\\_AW\\_REV\\_150dpi\\_REV.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf))

<sup>13</sup> Ministry of Housing, Communities and Local Government (2017). Fixing our broken housing market. (see <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>)

<sup>14</sup> Public Health England (2019). PHE Strategy 2020-25. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf))

**B.17 Healthy Lives, Healthy People: Our strategy for public health in England (2010)<sup>15</sup>:** sets out how our approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing, and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

**B.18 A Green Future: Our 25 Year Plan to Improve the Environment (2018)<sup>16</sup>:** sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Embed an ‘environmental net gain’ principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.
  - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
  - ‘Green’ our towns and cities by creating green infrastructure and planting one million urban trees.
  - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

**B.19 Build Back Better: Our Plan for Health and Social Care (2021)<sup>17</sup>:** sets out the government’s new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government’s plan to introduce a new Health and Social Care Levy.

**B.20 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)<sup>18</sup>:** sets out the Government’s plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

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<sup>15</sup> HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216096/dh\\_127424.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf))

<sup>16</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf))

<sup>17</sup> Department of Health and Social Care and Cabinet Office (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

<sup>18</sup> Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

**B.21 The Charter for Social Housing Residents: Social Housing White Paper (2020)**<sup>19</sup>: sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

**B.22 Using the planning system to promote healthy weight environments**<sup>20</sup> (2020), **Addendum (2021)**<sup>21</sup> provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

**B.23 Build Back Better: Our Plan for Health and Social Care (2021)**<sup>22</sup> sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

**B.24 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)**<sup>23</sup> sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

**B.25 A fairer private rented sector White Paper (2022)**<sup>24</sup> aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

### Sub-national

**B.26 Kent Joint Health and Wellbeing Strategy (2014)**<sup>25</sup>: outlines how Kent County Council seeks to improve people's health and reduce health inequalities in the county. The strategy has four key priorities:

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

**B.27 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)**<sup>26</sup>: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

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<sup>19</sup> Ministry of Housing, Communities and Local Government (2020). The charter for social housing residents: social housing white paper. (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history>)

<sup>20</sup> Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>)

<sup>21</sup> Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

<sup>22</sup> Department of Health and Social Care and Cabinet Office (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

<sup>23</sup> Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

<sup>24</sup> Department for Levelling Up, Housing and Communities (2022) A fairer private rented sector (see <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary>)

<sup>25</sup> Kent County Council (2014). Kent Joint Health and Wellbeing Strategy. (see [https://www.kent.gov.uk/data/assets/pdf\\_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf))

<sup>26</sup> Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see [https://www.kent.gov.uk/data/assets/pdf\\_file/0018/80145/GIF-Framework-full-document.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf))

- Ageing population challenging healthcare and local community services.
- New schools and school expansions required to support growth aspirations.
- Implications and uncertainties regarding post-Brexit border control management.

**B.28** The GIF summarises the need for future infrastructure projects in Dover, including major housing developments (Dover Port, Town Centre and Seafront, Whitfield and Discovery Park in Sandwich).

**B.29 East Kent Growth Framework (2018)**<sup>27</sup>: sets out an overarching strategic approach for identifying investment priorities to achieve long-term economic growth across East Kent between 2017 and 2027. The Framework incorporates the five East Kent Districts of Ashford, Canterbury, Dover, Folkestone and Hythe and Thanet. There are four key objectives:

- Unlocking growth through infrastructure – identified sites for development need supporting transport and digital infrastructure, particularly targeted upgrading and making better use of road and rail networks (particularly High Speed 1) to enhance domestic and international connectivity while enabling local accessibility.
- Delivery of business space – the next-generation of modern commercial space for business start-ups, encouraging existing businesses to scale-up and helping attract new mobile investment into the area while driving forward the development of brownfield sites.
- Supporting skills and productivity within business – creating an environment for innovation in productivity improvements, supporting businesses to grow and move up the value chain, encouraging faster broadband, ensuring that businesses have the skills to grow and that the region’s skills base continues to improve, and is linked to the success of higher education and further education sectors creating talent.
- Place making and shaping –improving the perception of people’s idea of East Kent and make it a location of first choice that retains and attracts young people, families and entrepreneurs, while at the same time maximising the potential of the natural assets, enhancing town centres and ensuring a high quality built environment.

**B.30** Of these four key objectives, unlocking growth through infrastructure is considered to be the most important and focuses on securing delivery of critical infrastructure projects, working with industry bodies and other bodies where necessary.

**B.31 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)**<sup>28</sup>: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030:

- East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-target housing supply, and connections to London, the South East and Europe.
- There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.
- Outreach programmes will be used to promote opportunities for education in the community. They will help to raise people’s aspirations, increase their potential stake in local economic success and bring together groups that might otherwise be marginalised, including the elderly, ethnic minorities and those seeking to return to work.
- The current inequalities in prosperity, prospects and living conditions will have receded significantly.
- Imbalances in the health and life expectancy of East Kent’s citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and

<sup>27</sup> East Kent Regeneration Board (2018). East Kent Growth Framework (see <http://kmep.org.uk/news/info-page/east-kent-growth-framework-march-2018>)

<sup>28</sup> East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))



anti-social behaviour; poor quality, bad managed housing will have been upgraded and will no longer represent a magnet for further disadvantage; and communities will be at ease with the natural diversity.

**B.32 Kent Rights of Way Improvement Plan (n.d.)<sup>29</sup>:** the vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. Notable improvements in Dover include the creation of a new England Coast path along the District's coastline and beyond, providing access to the coastline in accordance with the Marine and Coastal Access Act 2009 and upgrades to existing public footpaths associated with the Sholden development, providing access to local schools, Fowlmead Country Park and Deal town centre.

## Current baseline

### Population

**B.33** Dover District contains the three towns of Dover, Deal and Sandwich and a large rural area with a great variety of villages including those associated with the former East Kent Coalfield. Mining activity and other industrial uses have left a legacy of isolated pockets of derelict and despoiled land in parts of the District which contrasts with the natural and historic beauty of the District. In 2020 the population of Dover was 118,500 people, the fourth smallest local authority population in Kent<sup>30</sup>. The working age population of Dover was 69,500 people<sup>31</sup>.

**B.34** In the future, over the period 2018-2043 the projections show that the population of Dover District will increase from 116,969 to 141,405 people. This is predominantly due to domestic migration flows, as natural change is negative (i.e. more deaths than births)<sup>32</sup>. However, it's important to note that as outlined in the 2021 Census, Dover's population increase (4.2%) is lower than the overall increase for England (6.6%) and the South East (7.5%). As of 2021, Dover is the 23<sup>rd</sup> least densely populated of the South East's 64 local authority areas<sup>33</sup>. In 2021, the District ranked 206<sup>th</sup> for total population out of 309 local authority areas in England, which is a fall of five places in a decade (from 201<sup>st</sup> in 2011).

**B.35** Nearby areas like Ashford and Thanet have seen their populations increase by around 12.5% and 4.8%, respectively, while others such as Canterbury saw an increase of 4.1% and Folkestone and Hythe saw smaller growth of 1.7%. The largest population increases in the South East have been in Dartford and Milton Keynes, where the populations have grown by 20% and 15.3%, respectively. At the other end of the scale, Gosport has seen a fall of 0.9%.

**B.36** The ONS 2018 SNPP shows Dover District will attract nearly 14,921 new residents via migration over the period 2018-2028. Most of this migration is 'domestic' flowing from elsewhere in the UK<sup>34</sup>.

**B.37** Natural change will however continue to be negative, with the ONS 2018 SNPP projecting increases of about 14,156 deaths and 11,085 births between 2018 and 2028<sup>35</sup>.

### Gypsy, traveller and travelling showpeople

**B.38** The updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment found that there is a need for a total of 42 pitches in Dover District between 2020 and 2040<sup>36</sup>. However, if consideration is given to potential turnover and opportunities for additional capacity, this would result in a residual need for 4 pitches.

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<sup>29</sup> Kent County Council. Kent Rights of Way Improvement Plan 2018-2028 (n.d.). (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf))

<sup>30</sup> NOMIS (2021). Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabrespop>)

<sup>31</sup> NOMIS (2021). Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabrespop>)

<sup>32</sup> ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionforengland/2018based#change-by-regionprojections>)

<sup>33</sup> ONS (2021). Population change of selected local authority areas in the South East between 2011 and 2021. (see <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000108/>)

<sup>34</sup> ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionforengland/2018based#change-by-region>)

<sup>35</sup> ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionforengland/2018based#change-by-region>)

<sup>36</sup> Arch4 (2020) Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Housing.aspx>)

## Housing

**B.39** Dover District contains two urban areas (Dover and Deal), a market town (Sandwich) and a large number of villages. In general, Sandwich and the north of the District are the most expensive parts of Dover District, while Dover Town and the south of the District are the cheapest. Prices in Deal are notably cheaper than Sandwich, but more expensive than Dover Town<sup>37</sup>. The mean price of dwellings in Dover District was £302,181<sup>38</sup> in June 2022, which is a 9% increase from June 2021 (£277,492). This is lower than the national (£304,867) and regional level (£390,513).

**B.40** The 2021 Census showed that the number of households in Dover District increased by 4.5% since 2011, reaching 50,500 households in total. This compares to the national figure of 6.2%. In the District the number of households rose at a slower rate than households between 2001 and 2011<sup>39</sup>.

**B.41** The 2021 Census is currently being processed and therefore some data is not yet available and we have therefore retained reference to the previous 2011 Census. The 2011 Census showed that there were more single person households and few couple households with dependent children in the District than recorded regionally and nationally. A similar pattern has been shown by the more recent 2021 Census, which found there to be 3 million lone parent families, which accounting for 15.4% of families in the UK. Furthermore, over the period 2001 to 2011 the main change in household types was a growth in 'other' households, followed by lone parent households with no dependent children. However, the households with only non-dependent children increased while the number of households with dependent children decreased. This suggests that household formation rates amongst young adults may have reduced<sup>40</sup>.

**B.42** In Dover, District, there has been an increase of 23.9% in people aged 65 years and over, a decrease of 1.2% in people aged 15 to 64 years, and an increase of 1.1% in children aged under 15 years. This compares to an overall increase, in England, of 20.1% in people aged 65 years and over, 3.6% in people aged 15 to 64 years, and 5% of children aged under 15 years. The 2021 Census indicates that the largest increase in population in the District has been in people aged 70 to 79 and that the largest decrease has been in people aged 40 to 49.

**B.43** As outlined in the 2011 Census, 24.8% of households in Dover District were older person only households (households where all members are 65 or over), compared to 21.9% regionally and 20.5% nationally. Of these older person only households in Dover District in 2011, 59.1% contained only one person, a higher proportion than that recorded in the South East region (57.7%) but lower than the figure for England (60%)<sup>41</sup>.

**B.44** During the preparation of the Publication Local Plan, the minimum requirement for housing need in the District was calculated using the standard method in national planning guidance and baseline 2014-based household projections. In April 2022, this equated to a requirement for 596 dwellings per year, totalling 11,920 dwellings across the 20-year Plan period 2020 to 2040. A 10% buffer (1,192 dwellings) was added to this total to provide the necessary flexibility to ensure the District's minimum housing needs are delivered within the Plan period<sup>42</sup>.

**B.45** The District has a number of existing commitments which reduce the overall level of housing the Local Plan will need to plan for through site allocations and windfalls<sup>43</sup>. Commitments are sites with existing planning permission, both major and minor. As of 1st April 2020, during the preparation of the Draft Local Plan, there were 4,408 extant permissions.

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<sup>37</sup> Peter Brett Associates (2017). Strategic Housing Market Assessment (Parts 1 and 2). (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-SHMA-Feb-2017.pdf> and <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHMA-Dover-Part-2-Feb-2017.pdf>)

<sup>38</sup> UK House Price Index (2021). (see <https://landregistry.data.gov.uk/app/ukhpi>)

<sup>39</sup> ONS (2022). Population and household estimates, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimateenglandandwalescensus2021>)

<sup>40</sup> Dover District Council (2017). Dover District: Authority Monitoring Report 2016/ 2017. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2016-17.pdf>)

<sup>41</sup> Peter Brett Associates (2017). Strategic Housing Market Assessment (Parts 1 and 2). (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-SHMA-Feb-2017.pdf> and <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHMA-Dover-Part-2-Feb-2017.pdf>)

<sup>42</sup> The 10% buffer is recommended through the District's Strategic Housing Market Assessment (SHMA, 2017) as an appropriate buffer level to ensure need is delivered.

<sup>43</sup> The term 'windfall sites' is used to refer to those sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's Local Plan. Over the last 10 years windfall development has made an important and sustained contribution to the provision of additional homes in this District, accounting for 45% of all completed dwellings within the District over this period. Over two thirds of these windfall developments have been new-build dwellings, with 85% of these coming forward on previously developed land.

**B.46** Taken together, the total residual housing requirement that the Draft Local Plan (Regulation 18) was found to need to deliver over the Plan period through the allocation of sites and windfall development was 8,704 dwellings (rounded down to 8,700).

**B.47** The SA of the District's growth options noted that the final housing target for the Local Plan was subject to change up until the methodology for calculating need was finalised towards the end of the plan-making process. During the preparation of the Regulation 19 Publication Local Plan, the minimum requirement for housing need in the District was calculated using the standard method in national planning guidance and baseline 2014-based household projections. In April 2022, this equated to a requirement for 611 dwellings per year, totalling 10,998 dwellings across the 18-year plan period 2022 to 2040. A contingency buffer (roughly 8.4%) increases the figure by 926 dwellings to 11,924 dwellings. Factoring in updated extant commitments recorded during the preparation of the Publication Local Plan (5,282 dwellings), the total residual housing requirement that the Publication Local Plan must plan for through the allocation of sites and windfall development is 5,716 dwellings. The significant effects of this lower scale of growth are appraised in Chapter 7 through the SA of the Regulation 19 Publication Local Plan.

**B.48** In December 2021, this equated to a requirement for 611 dwellings per year, totalling 10,998 dwellings across the 20-year plan period 2020 to 2040. A contingency buffer (roughly 9.1%) increases the figure by 996 dwellings to 11,994 dwellings. Factoring in updated extant commitments recorded during the preparation of the Publication Local Plan (5,282 dwellings), the total residual housing requirement that the Publication Local Plan must plan for through the allocation of sites and windfall development is as 5,282 dwellings.

**B.49** A Whole Plan Viability Assessment (2020)<sup>44</sup> undertaken alongside preparation of the Publication Local Plan in order to ensure that its contents are viable over the Plan period. However, the assessment highlights the importance of ongoing and proactive dialogue between site owners and developers and the Council. The assessment also acknowledges the uncertainty around the impact of COVID-19 and Brexit on the economy and recommends that the Council monitor their effects closely, so that appropriate changes can be made to the Local Plan before it is adopted.

## Education

**B.50** Skill attainment levels in the District have improved over the last ten years. The percentage of residents of working age without qualifications has decreased and is now lower than the Kent average<sup>45</sup>. The percentage of working age residents with NVQ 4 qualifications increased from 33.3% to 34.6%, between 2019 and 2021<sup>46</sup>. This is lower than both the regional (45.2%) and national average (43.6%).

**B.51** The Kent and Medway Growth and Infrastructure Framework (GIF)<sup>47</sup> highlights significant capacity issues at primary schools around Dover and Deal (although authority-wide surplus). According to the Commissioning Plan for Education Provision in Kent<sup>48</sup>, the number of primary age pupils is expected to continue rising from 139,714 in 2025-26 to 141,301 in 2035-36, although falling birth rates are likely to mitigate this. In the same period the number of secondary age pupils in Kent schools is expected to rise from 103,639 in 2025-26 to 108,468 in 2035-36. KCC will address these increasing school pupil numbers by expanding existing schools and creating new primary, secondary and special schools.

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Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.

<sup>44</sup> HDH Planning and Development (2020). Whole Plan Viability Study. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-WPVS-5.11.20-WITH-APPENDICIES.pdf>)

<sup>45</sup> Dover District Council (2020). Dover District: Authority Monitoring Report 2020/21. (see <https://www.dover.gov.uk/Planning/Regeneration/PDF/AMR-1432reduced.pdf>)

<sup>46</sup> NOMIS (2021) Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabequals>)

<sup>47</sup> Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf))

<sup>48</sup> Kent County Council (2020). Commissioning Plan for Education Provision in Kent 2022-2026. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0005/131486/Commissioning-Plan-for-Education-Provision-in-Kent-2022-to-2026.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0005/131486/Commissioning-Plan-for-Education-Provision-in-Kent-2022-to-2026.pdf))

## Deprivation

**B.52** The English Indices of Deprivation 2019 reinforce previously identified patterns of deprivation across the District<sup>49</sup>. Dover District continues to have deprivation 'hot spots' that are amongst some of the most deprived small areas in the country yet are geographically close to some of the least deprived areas in the country.

**B.53** When compared with other local authorities in Kent and England as a whole, the District of Dover is in the bottom half of the country's most deprived local authorities. Dover is ranked 1 nationally (1 being the most deprived), out of over 325 English local authority Districts. Figure B1 illustrates the indices of multiple deprivation across the District.

## Health

**B.54** The health of people in Dover is varied compared with the England average. The rate of alcohol-related harm hospital stays is 485 (rate per 100,000 population), which is better than the average for England. However, estimated levels of adult excess weight are worse than the England average. Life expectancy is 5.9 years lower for men and 4.4 years lower for women in the most deprived areas of Dover than in the least deprived areas<sup>50</sup>.

**B.55** About 19.4% (3,715) of children live in low income families. In Year 6, 19.1% (206) of children are classified as obese. Levels of GCSE attainment and smoking at time of delivery are worse than the England average<sup>51</sup>.

**B.56** According to Public Health England, priorities in Dover include improving life expectancy by preventing suicide, cancer and reducing smoking prevalence, during pregnancy and improving physical activity in children and adults<sup>52</sup>.

## Open spaces, sport and recreation

**B.57** There is a vast array of open spaces in the Dover District, including major municipal parks, gardens, local nature reserves, promenades, sports pitches and various informal grass areas.

**B.58** With regard to accessible green space, an assessment<sup>53</sup> of current provision against the accessible green and open space standards shows that in general the quantity of provision is acceptable. Furthermore, the vast majority of open spaces rate above the threshold for quality. Enhancing existing sites instead of creating new spaces is a priority in the short term. The Open Space and Play Standards Paper (2020) considers the likely increase in future open space requirements based on current population forecasts, identifying a need for up to 55ha of accessible green space, over 6ha of allotments roughly 1.75ha of play space for children and young people.

**B.59** The Council's Green Infrastructure Strategy<sup>54</sup> reports the District's wide range of extremely high-quality Green Infrastructure (GI) assets. It identified the country parks of Samphire Hoe and Fowlmead alongside the major formal parks (such as Kearsney Abbey, Russell Gardens, Connaught Park, Pencester Gardens and Victoria Park, Deal) to be the most significant in terms of accessible green space.

**B.60** An extensive public rights of way network covers much of Dover District and includes the strategic routes of the White Cliffs Country Trail and North Downs Way. It also includes the England Coast Path which is a new National Trail that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. Due to its scale, the England Coast Path is being developed in 'stretches'. On 19<sup>th</sup> July 2016 the first stretches of the Coast Path in Kent,

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<sup>49</sup> UK Government (2019). English Indices of Deprivation 2019. (see <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

<sup>50</sup> Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-name=dover>)

<sup>51</sup> Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->)

<sup>52</sup> Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->)

<sup>53</sup> Dover District Council (2020). Open Space and Play Standards Paper. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/open-space-and-play-standards-paper-2019.pdf>)

<sup>54</sup> Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

between Ramsgate and Chamber, were opened to the public. Given the importance of accessibility to GI issues, the network has the potential to play an important role in the GI strategy<sup>55</sup>.

**B.61** With regard to sport and recreation, the Playing Pitch Strategy<sup>56</sup> highlights issues with the quality of some of the District's cricket pitches and tennis courts. Furthermore, there is an under provision of 5v5 and artificial turf football pitches and rugby union pitches and tennis courts. The most severe deficiencies occur in Dover. There is little in the way of spare capacity. Deficiencies in ancillary facilities sometimes present a barrier to participation. For example, the quality of changing facilities. Figure B2 illustrates a range of services and facilities across the District.

**B.62** The Playing Pitch Strategy (2019) considers the likely increase in future playing pitch requirements based on current population forecasts, identifying a need for up to eight adult football pitches, ten youth football pitches, eight mini soccer pitches, four rugby union pitches and four cricket pitches.

### Crime

**B.63** Kent has the highest crime rate in England and Wales<sup>57</sup> and the rate of violent crime in the District is growing<sup>58</sup>. There has been a steady increase in total annual crimes over the past five years in Dover District, with 1,099 crimes recorded in June 2022, compared with 707 crimes recorded in July 2020 and 1,137 in July 2021<sup>59</sup>.

### Noise and odour

**B.64** There are several notable land uses within the District which have the potential to affect existing and new communities within close proximity to them. Major roads such as the M20/A20, M2/A2 and A256 generate noise and air pollution which has the potential to affect those living in nearby areas, particularly during peak traffic times. Dover Town is the world's busiest roll on roll off ferry port, with ferries departing for France every 20 minutes. The Port of Dover also serves as a major International Cruise ship terminal<sup>60</sup>. Altogether there are 10 railway stations located in the District. Within Dover District, Dover Priory railway station is the busiest. South Eastern Railway provides a high speed rail service to and from London in one hour. There are no airports located within the District. However, there are plans to reopen Manston Airport in the neighbouring District of Thanet, following the granting of a development consent order, as an airfreight hub of national significance. Noise from the operational airport has the potential to adversely affect Dover communities on flight paths to and from the airport. Consultation on the proposed noise mitigation plan took place between January and February 2018. Revisions were made to the mitigation plan in July 2019<sup>61</sup>.

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<sup>55</sup> Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

<sup>56</sup> Dover District Council (2019). Playing Pitch Strategy and Action Plan

<sup>57</sup> UKCrimeStats (2021). Crime by Subdivision. (see <https://www.ukcrimestats.com/Subdivisions/>)

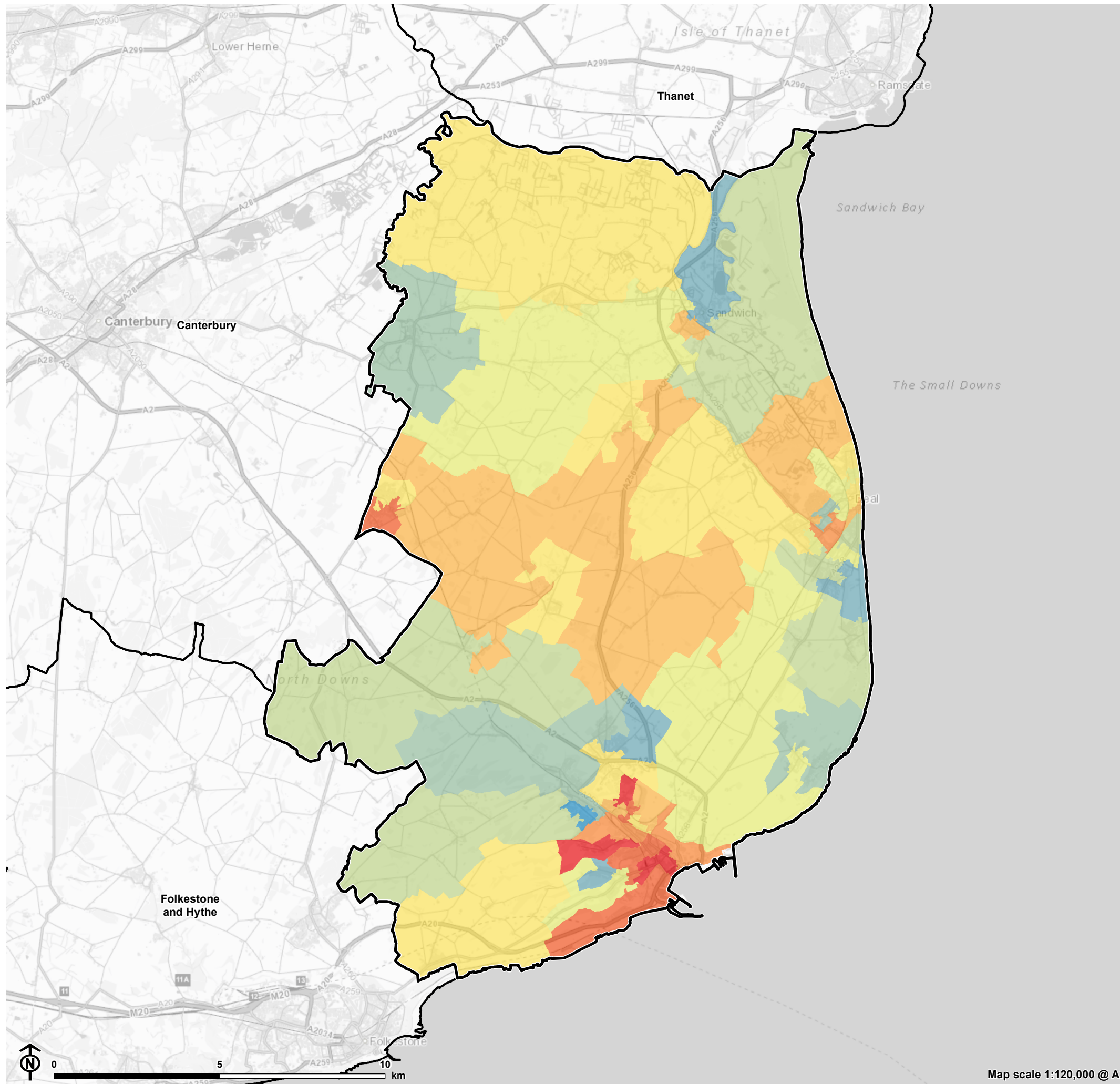
<sup>58</sup> Public Health England (2020). Dover District: Heath Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-profiles/2017/e07000108.pdf>)

<sup>59</sup> UKCrimeStats (2021). Crime by Subdivision. (see <https://www.ukcrimestats.com/Subdivisions/>)

<sup>60</sup> Dover District Council (2017). 'Getting Around Dover District'. (see <https://www.dover.gov.uk/Transport,-Streets--Parking/Transport--Streets/Getting-Around.aspx#Rail>)

<sup>61</sup> River Oak Strategic Partners (2019). Revised 2.4 Noise Mitigation Plan: Manston Airport Development Consent Order. (see <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004719-Noise%20Mitigation%20Plan%20D12%20clean.pdf>)

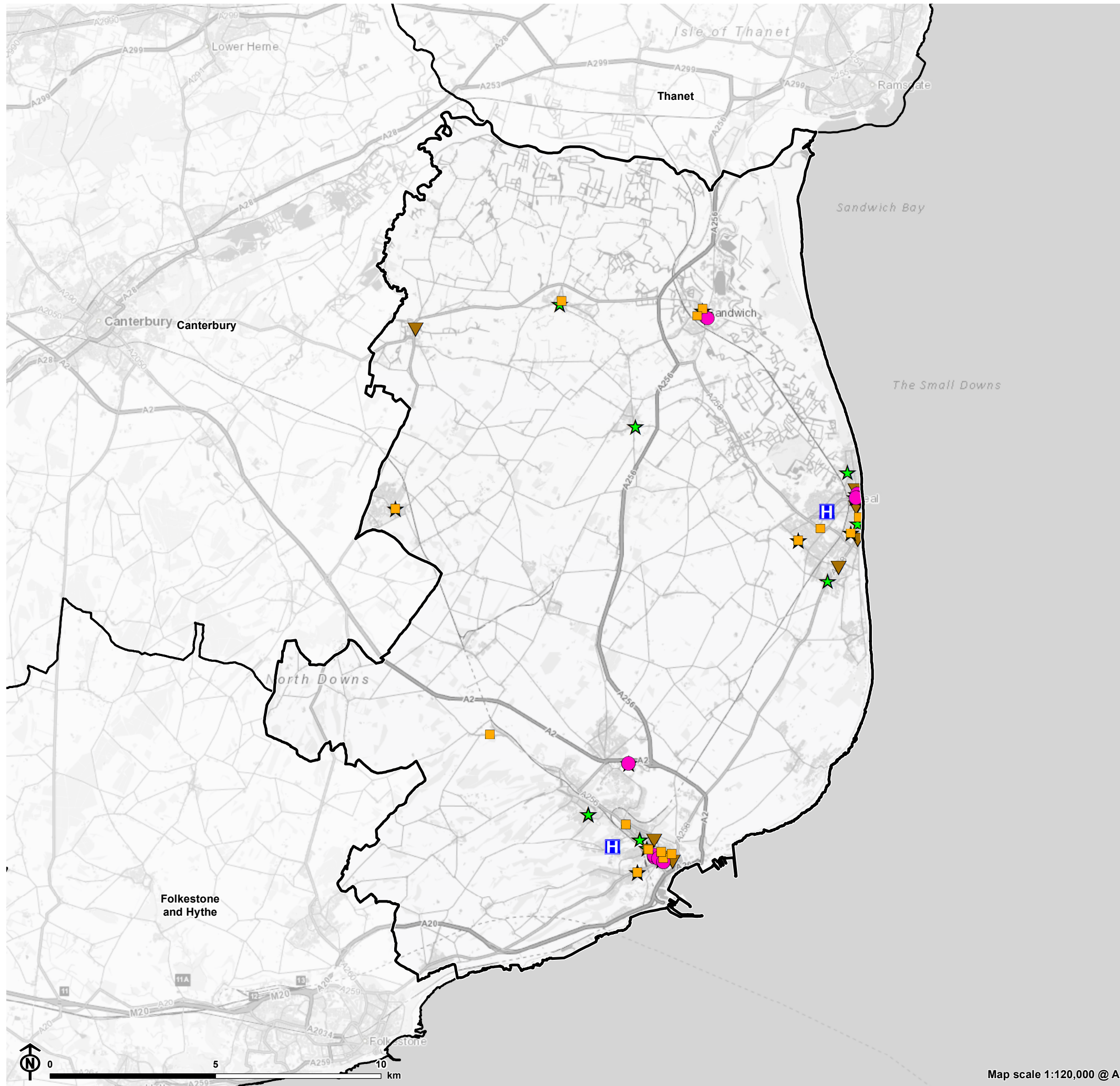
Figure B.1: Index of Multiple Deprivation



- District boundary
- Neighbouring district boundary
- IMD decile**
- 0 - 10% (most deprived)
- 10 - 20%
- 20 - 30%
- 30 - 40%
- 40 - 50%
- 50 - 60%
- 60 - 70%
- 70 - 80%
- 80 - 90%
- 90 - 100% (least deprived)

Map scale 1:120,000 @ A3

Figure B.2: Services and Facilities



- District boundary
- Neighbouring district boundary
- GP practice
- Optician
- Pharmacy
- Dentist
- Hospital

## Sustainability issues and likely evolution without the Local Plan

**B.65** Analysis of the baseline information has enabled a number of key sustainability issues facing Dover to be identified. They are as follows:

- Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities (see SA objective 1).
- There is a need for affordable housing across Dover. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery (see SA objective 1).
- There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to-date Local Plan, the required housing is less likely to be delivered (see SA objective 1).
- There is a need to reduce the gap between those living in the 10% most deprived areas of Dover (Dover Town) and those living in the least deprived areas of Dover. Dover District contains deprivation 'hot spots' that are geographically close to some of the least deprived parts of the country. The Local Plan presents an opportunity to address this through the planning of new and improved communities and infrastructure (see SA objective 2).
- Levels of obesity in the District exceed the national average. The Local Plan can tackle the health of its residents more generally in an integrated fashion by providing for, or encouraging access to, healthcare facilities and opportunities to exercise and travel on foot and by bicycle (see SA objective 2).
- The quality of the District's green and open spaces can be improved. The Local Plan will help to ensure that the accessibility and quality of local green spaces (new and existing) are planned alongside new development in the District (see SA objective 2).
- As the population of the District continues to rise, the District's existing local services, facilities and infrastructure will be required to expand to meet local needs. The Local Plan provides a means to embed this thinking in the locations for new development (see SA objective 2).

## SA objectives

**Table B.1: Population growth, health and well-being SA objectives and appraisal questions**

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	SA1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period? SA1.2: Does the Plan allocate small, medium to scale sites to deliver homes in the short, medium and long term? SA1.3: Do the Plan's allocations safeguard and enhance the identity of the District's existing communities and settlements?	Population Human Health Material Assets
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	SA2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all? SA2.2: Does the Plan promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, recreation and sports facilities, including those set out in the Dover District Sport and Recreation Strategy? SA2.3: Does the Plan protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with poor air quality, noise, vibration and odour?	Population Human Health Material Assets



## Economy

### Policy context

#### International

**B.66** There are no specific international or European economic policy agreements relevant to the preparation of the Local Plan and the SA, although there is a large number of trading agreements, regulations and standards that set down the basis of trade within the EU and with other nations.

#### National

**B.67 National Planning Policy Framework (NPPF) (2021)**<sup>62</sup> contains the following:

- The economic role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.
- Planning policies should address the specific locational requirements of different sectors.
- Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”.
- When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.
- The NPPF requires Local Plans to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”

**B.68 National Planning Practice Guidance (NPPG) (2021)**<sup>63</sup>: reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

**B.69 The Local Growth White Paper (2010)**<sup>64</sup>: highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

**B.70 Build Back Better: Our Plan for Growth (2021)**<sup>65</sup>: sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**B.71 National Infrastructure Delivery Plan (2016-2021)**<sup>66</sup>: sets out the government’s plans for economic infrastructure over a five year period with those to support delivery of housing and social infrastructure.

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<sup>62</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>63</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (last updated 24 June 2021). National Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>64</sup> Department for Business, Innovation and Skills (2010). Local Growth: Realising Every Place’s Potential. (see <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>)

<sup>65</sup> HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>)

<sup>66</sup> Department for Business, Energy and Industrial Strategy (2016). National Infrastructure Delivery Plan. (see <https://www.gov.uk/government/collections/national-infrastructure-plan>)

**B.72 The Levelling Up and Regeneration Bill (2022)**<sup>67</sup> sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

**B.73 UK Industrial Strategy: building a Britain fit for the future (2018)**<sup>68</sup>: lays down a vision and foundations for a transformed economy. Areas including: artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four 'Grand Challenges' of the future.

**B.74 Agriculture Act 2020**<sup>69</sup>: legislation setting out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the government's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

**B.75 Agricultural Transition Plan 2021 to 2024 (2020)**<sup>70</sup>: sets out the changes going to be made to agricultural policy in England from January 2021 to the end of 2027. Between 2021 and 2027, the government will gradually phase out direct payments and introduce a new system based on the principle of public money for public goods. The government will pay farmers and land owners to improve the environment, animal health and welfare, and reduce carbon emissions. There will be three levels of support aimed at paying for sustainable farming practices, creating habitats for nature recovery and making landscape-scale change such as establishing new woodland and other ecosystem services. Some options will be universally open to all farmers and land managers, while others will be more targeted at a smaller number of large projects. There will also be significant grants made available to support farmers to reduce their costs and improve their profitability, to help those who want to retire or leave the industry, and to create new opportunities and support for new entrants coming into the industry.

**B.76 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)**<sup>71</sup>: the aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

### Sub-national

**B.77 South East Local Enterprise Partnership (SELEP) Economic Recovery and Renewal Strategy (2021)**<sup>72</sup>: this document sets out how SELEP will work with partners to recovery from the COVID-19 pandemic. The document outlines four strategic priorities:

- Foster business resilience and growth in the South East business community;
- Promote the South East business community as the 'UK's Global Gateway';
- Support communities in South East business community for the future; and
- Increase the productivity of the coastline in the South East business community.

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<sup>67</sup> Department for Levelling Up, Housing and Communities (2022) Levelling Up and Regeneration Bill. (<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

<sup>68</sup> Department for Business, Energy and Industrial Strategy (2018). Building a Britain fit for the future. (see <https://www.gov.uk/government/topical-events/the-uks-industrial-strategy>)

<sup>69</sup> UK Parliament (2020). Agriculture Act 2020. (see <https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm>)

<sup>70</sup> Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024. (see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

<sup>71</sup> LEP Network (2017). Response to the Industrial Strategy Green Paper Consultation. (see <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>)

<sup>72</sup> South East Local Enterprise Partnership (2021). Economic Recovery and Renewal Strategy. (see <https://www.southeastlep.com/our-strategy/economic-recovery-and-renewal-strategy/>)

**B.78 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)**<sup>73</sup>: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

- The Dover Western Docks Revival is developing Dover's cargo business with a new cargo terminal and distribution centre to boost productivity and employment.
- Implications and uncertainties regarding post-Brexit border control management.

**B.79 Kent and Medway Economic Renewal and Resilience Plan (2020)**<sup>74</sup>: outlines the Kent and Medway Economic Partnership's priorities for supporting post COVID-19 economic renewal and the development of an economy that will be more resilient in the future. The Renewal and Resilience Plan seeks to deliver against three key principles, focused on:

- Greener Futures (building a more sustainable, lower carbon economy).
- Open and Productive (supporting long term productivity growth in an economy that welcomes investment and trade).
- Better Opportunities, Fairer Chances (ensuring that people are supported through recession and stand to gain from a more resilient economy in the return to growth).

**B.80 Kent and Medway Employment Plan (2020)**<sup>75</sup>: identifies actions that will mitigate the extent and impact of unemployment and under-employment in Kent and Medway. The Employment Plan sets out four key priorities:

- Supporting young people into work, maximising benefits from the Government's Kickstart scheme and ensuring that delivery partners in Kent and Medway work together; developing a network of hubs where young people facing barriers to employment can access work and skills advice; exploring new opportunities for work-based learning in the context of weaker industry demand; and increasing opportunities to access higher education.
- Supporting the existing workforce, especially older workers experiencing unemployment or at risk of redundancy. This includes coordination of the Adult Education Budget across Kent and Medway to increase access to digital skills, and access to careers advice and guidance as workers change sector and occupation.
- Responding to redundancy, to mitigate the impacts of redundancy programmes where they occur, by encouraging use of Jobcentre Plus's Rapid Response Service and delivering advice to businesses via the Kent and Medway Growth Hub.
- Driving future demand, through the business support and investment measures proposed in the Kent and Medway Renewal and Resilience Plan, promoting local employment as firms expand and new projects come forward, and developing a more robust understanding of labour supply and demand as we plan for the future.

**B.81 Lighting the way to success: The East Kent Local Strategic Partnership Sustainable Community Strategy (2009)**<sup>76</sup>: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030:

- East Kent will have a thriving and diverse local economy, well adapted to the needs and character of the area.
- East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-target housing supply, and connections to London, the South East and Europe.

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<sup>73</sup> Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0018/80145/GIF-Framework-full-document.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf))

<sup>74</sup> Kent County Council (2020). Kent and Medway Economic Renewal and Resilience Plan. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/112280/Economic-Renewal-and-Resilience-Plan-Backing-Jobs-and-Businesses-Plan.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/112280/Economic-Renewal-and-Resilience-Plan-Backing-Jobs-and-Businesses-Plan.pdf))

<sup>75</sup> Kent County Council (2020). Kent and Medway Employment Plan. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0003/116706/Kent-and-Medway-Employment-Plan.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0003/116706/Kent-and-Medway-Employment-Plan.pdf))

<sup>76</sup> East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Document-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Document-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

- There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.
- East Kent will be reaping the benefit of an expanded transport network. Benefits will include greater mobility for businesses and wider opportunities for employment.
- The revival of East Kent's coastal resorts and the integrated marketing of its attractions will have boosted visitor numbers, average expenditure and length of stay, supporting an additional 10,200 jobs in the tourist economy.

**B.82 East Kent Local Investment Plan 2011-2026 (2011)**<sup>77</sup>: outlines the scale and focus of investment and support required to deliver a programme of projects that will deliver the East Kent Sustainable Communities Strategy's vision and priorities. Economic prosperity and job creation is at the heart of the East Kent vision. This will include rebalancing the economy through nurturing both new investment and existing businesses and by making sure innovation and enterprise go hand in hand. East Kent Partners have identified 8 strategic spatial priorities, 3 of which are relevant to Dover District:

- Dover Port, Waterfront and Town Centre:
  - Expansion of Dover Port: To consolidate position as global gateway for movement of passengers and freight.
  - Dover Waterfront: A 12.2 hectare brownfield, mixed use development including hotel, restaurants, offices, retail and a minimum of 300 new residential homes with potential for up to 800. Potential for 90-240 affordable homes.
  - Mid Town: A 5.9 hectare brownfield, mixed use development comprising residential, retail, restaurants, education. At least 100 new homes with potential for at least 30 affordable homes.
  - St James: A 3.2 hectare brownfield, mixed use town centre physical regeneration site. Development will include a supermarket anchor store, retail residential, hotel and leisure facilities.
  - Public transport improvements: To address challenges associated with the expansion of Dover, the splitting of port traffic along the A2 Corridor for the Eastern Docks and A20 for the Western Docks, and providing sustainable transport solutions to the planned expansion at Whitfield. A central theme here will be to ensure effective integration with Dover Train Station and the High Speed 1 service.
- A2 Corridor:
  - Improvements include dualling of the A2 between Lydden and Whitfield to facilitate housing growth and the longer term strategic aim of separating HGV demand at the Port of Dover via the A2 and A20.
- Whitfield Extension:
  - The core element of Dover's Growth Point focused around a 309 hectare site capable of providing up to 5,750 new homes (including a proportion of affordable homes) supported by a range of infrastructure and community facilities.

**B.83 Kent and Medway Energy and Low Emissions Strategy (2020)**<sup>78</sup> sets out how they will respond to the UK climate emergency and promote clean and resilient economic recovery that eliminates poor air quality, reduces fuel poverty and promotes the development of an affordable, clean and secure energy supply across Kent and Medway. The Strategy identifies ten high-level priorities for collaborative action in the short- and medium-term:

- Emission Reduction Pathways to 2050;
- Public Sector Decision Making;
- Planning and Development;
- Climate Emergency Investment Fund;
- Building Retrofit Programme;

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<sup>77</sup> East Kent Local Strategic Partnership (2011). East Kent Local Investment Plan 2011-2026. (see <https://www2.canterbury.gov.uk/media/160669/appendix-e-local-investment-plan-part-a.pdf>)

<sup>78</sup> Kent County Council (2020). Kent and Medway Energy and Low Emissions Strategy. (see [https://www.kent.gov.uk/data/assets/pdf\\_file/0009/112401/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0009/112401/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf))

- Transport, Travel and Digital Connectivity;
- Renewable Energy Generation;
- Green Infrastructure;
- Supporting Low Carbon Business; and
- Communications.

## Current baseline

**B.84** Dover District represents a reasonably small but productive economy in East Kent. When compared with the share of employment in the South East, the District is overrepresented in the wholesale and transport, public administration and defence, utilities and manufacturing sectors, whilst being under-represented in professional and other private sectors. The current major employment locations are the Port of Dover and the various industrial estates around Sandwich.

**B.85** The Dover Economic Development Needs Assessment<sup>79</sup> notes the local labour market is characterised by a lower share of the working-age population being economically active and a higher share claiming out-of-work benefits when compared to the Kent and South East averages. Across the local economy overall, 17.7% of Dover District's working residents had been furloughed through the Coronavirus Job Retention Scheme (JRS) at the height of the pandemic in May 2020, and while local unemployment has risen sharply, the full effects are likely to be masked by the extension of government support schemes such as the JRS.

**B.86** Based on the latest available Experian data, Dover District accommodated 42,200 workforce jobs in 2021, representing a decline of 5% (-2,200) over the five-year period from 2016 (i.e. the baseline year for the 2017 EDNA). This rate of job decline is higher than that recorded in the South East (-2.2%) and the UK (-0.06%) during the same period. The District's employment base has been gradually declining over this five-year period. Whilst 2021 recorded the lowest employment count at 42,200 workforce jobs, the trend of job decline had begun well ahead of the outbreak of Covid-19 in early 2020.

**B.87** Table B.2 below from the Dover Economic Development Needs Assessment<sup>80</sup> shows the available supply should broadly be sufficient to meet identified office, general industrial and distribution needs, a shortfall emerges with regards to light industrial use. However, a significant proportion of available supply is for a flexible mix of 'B class' uses, so could help to address this 'gap' in relation to light industrial uses depending on the form of development that comes forward.

Table B.2: Demand/Supply balance to 2040 by use

Use	Floorspace Requirement (GEA sqm)		Available Supply (sqm)	Overall Balance
	Labour Demand	Past Development Rates		
Office	11,985	-18,120	7,407	Balanced
Light Industrial	42,330	25,740	6,867	Shortfall
General Industrial	-7,240	52,250	47,672	Balanced
Distribution	1,850	37,840	36,413	Balanced
Mixed Use	-	19,580	81,049	Surplus
<b>Total</b>	<b>48,925</b>	<b>117,290</b>	<b>179,407</b>	<b>Surplus</b>

<sup>79</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf>)

<sup>80</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf>)

**B.88** The District's job base could recover to pre-pandemic levels by 2022/23 and then record steady growth for the remaining years of the Local Plan period to 2040. The overall scale of employment growth implied by the latest Experian forecasts is not dissimilar to that implied by equivalent forecasts analysed as part of the 2017 EDNA, but by comparison, expects office, industrial and distribution sectors to make a much larger contribution to job growth over the Local Plan period to 2040. This results in a significantly higher employment space requirement for the 20-year Plan period of 48,925m<sup>2</sup> or 11.1ha in land terms, compared with -0.8ha in the 2017 EDNA (covering a 21-year period to 2037). The majority of this requirement relates to light industrial uses. It also assumes that recent patterns of job decline across the District are reversed, as the economy recovers from Covid-19 and grows over the longer term. The Dover Economic Development Needs Assessment<sup>81</sup> refers to this scale of growth as the minimum to ensure that business growth potential is not constrained by lack of spatial capacity in future.

**B.89** If the last five-year development trend were to continue over the Local Plan period to 2040, this would require over 117,000m<sup>2</sup> or nearly 31ha of employment land, and could accommodate a range of mainly industrial and mixed office/industrial uses. The Council has a clear aspiration to introduce a step change in the delivery of economic growth within the District, as reflected within its new Economic Growth Strategy. This identifies a number of growth opportunities and projects (such as The Citadel, Western Heights, Dover Waterfront/Wellington Dock and Snowdown Park) which collectively offer the potential to achieve a higher level of job growth than implied by the latest Experian forecasts. The Dover Economic Development Needs Assessment<sup>82</sup> refers to this scale of growth as an indication of the scale of market potential for employment development should sufficient land in the right place be made available for developers and business occupiers in the District.

**B.90** In addition, a large part of the District's employment land supply is wrapped in a number of large strategic allocations, notably White Cliffs Business Park and Discovery Park. The Dover Economic Development Needs Assessment<sup>83</sup> therefore recommends that Council consider some selective allocation of additional sites over and above existing employment allocations in order to provide additional flexibility and choice to the market over the new Local Plan period.

**B.91** The Kent Environment Strategy<sup>84</sup> sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the sustained austerity on public sector finances and the need to work more efficiently. This means identifying opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible to deliver priorities.

**B.92** Uncertainty exists over what the economic impacts of Britain's exit from the EU. However, there is general consensus that the immediate impact will be negative. There is evidence of ongoing friction in trade and travel with Europe as different sectors of the economy work through the practicalities of the new trading arrangements and restrictions. Experian data suggests up to 20% of Dover District's local GVA (economic output) is concentrated within those sectors considered to be at highest Brexit risk. The impact of COVID-19 on changes in consumer behaviour and spending patterns tied to changes in average economic circumstances and travel patterns is unknown. The Social Market Foundation briefing paper published in July 2020 highlights that "lockdown will change consumer and business behaviour on a long-lasting basis, with a permanent shift to homeworking and digital retail. This change will impact urban spaces, risking widening income and wealth inequality. Reduced commuting costs will benefit white collar professionals, while those working in retail face widespread job losses".

**B.93** The Dover Economic Development Needs Assessment Update<sup>85</sup> states it is too early to understand how the pandemic and resulting structural changes may affect how businesses operate and the resultant demand for employment land. Sectors likely to grow during the pandemic include the health, logistics, energy, IT and communications and tourism sectors. A shift away from the county's large cities to areas with a better quality of life could benefit Dover.

**B.94** Similarly, it is likely that COVID-19 will accelerate the shift towards online retail and service access, resulting in higher shop vacancy rates on the high street and in retail parks as stores become financially unviable. Office space could increasingly become vacant and difficult to re-let as firms embrace a policy of (at least) partial homeworking, resulting a need to allocate less office space in Local Plans. This will have knock-on impacts for other businesses. Without office workers, tourists and shoppers returning to cities, food and drink and cultural attractions are at risk, as well as office management and cleaning services.

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<sup>81</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

<sup>82</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

<sup>83</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

<sup>84</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>85</sup> Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

**B.95** With regards to future retail need, the Retail and Town Centre Needs Assessment (2018)<sup>86</sup> concluded that there was no forecast capacity for new convenience goods floorspace over the Plan period; and no capacity for new comparison goods floorspace over the short term (to 2022) and the medium term (to 2027). However, by 2032 it identified capacity for 615sqm net comparison goods floorspace rising to 3,243sqm net by 2037.

**B.96** The Retail and Town Centre Needs Assessment was then updated in September 2021<sup>87</sup> to take account of:

- The implications arising from the COVID-19 pandemic;
- Updates to National Policy and the Governments changes to the Use Classes Order and Permitted Development rights; and
- Changes to the Plan period.

**B.97** The update to the Retail and Town Centre Needs Assessment identified no capacity for new convenience goods floorspace over the plan period to 2040. Looking at the centres in the District the study concluded that the Council needs to plan for less, not more retail floorspace over the next 5-10 years and beyond. The study did however identify a need for around 22 food and beverage outlets by 2040. Some of this need can be absorbed into existing businesses with remaining forecast need directed to the town centres first. In most cases the forecast need and any market demand can be met by the take up of suitable vacant units, the re-purposing of floorspace and/or part of mixed use developments.

## Sustainability issues and likely evolution without the Local Plan

**B.98** Key sustainability issues facing Dover are as follows:

- Job density in Dover District will continue to lag behind other Kent Districts without coordinated action in the Local Plan to promote regeneration of its town centres, improve the sustainability and prosperity of the rural economy and the provision of appropriate employment space(see SA objective 3).
- The Local Plan offers an opportunity to capitalise on the regional investment at Dover Port, Waterfront and Town Centre by diversifying and expanding the District’s employment areas industrially and geographically to provide equality of access and opportunity (see SA objective 3).
- Uncertainty exists over what the economic impacts of Britain’s exit from the EU and COVID-19. The Local Plan will need to offer sufficient flexibility to respond to these uncertainties (see SA objective 3).

## SA objectives

Table B.3: Economy SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA3: To deliver and maintain sustainable and diverse employment opportunities.	<p>SA3.1: Does the District have an adequate supply of land and infrastructure to meet the District’s forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?</p> <p>SA3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?</p> <p>SA3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?</p> <p>SA3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District’s town centres and tourist attractions?</p>	<p>Population</p> <p>Human Health</p> <p>Material Assets</p>

<sup>86</sup> Carter Jonas (2018). Dover District Council Retail and Town Centre Needs Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Retail.aspx>)

<sup>87</sup> Lambert Smith Hampton (2021). Dover District Council Retail and Town Centre Needs Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Retail.aspx>)

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
	<p>SA3.5: Does the Plan support the prosperity and diversification of the District's rural economy?</p> <p>SA3.6: Does the District have sufficient education facilities to help provide the working population the District's existing and future employer needs?</p>	

## Transport connections and travel habits

### Policy context

#### International

**B.99 The Trans-European Networks (TEN):** created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

#### National

**B.100 National Planning Policy Framework (NPPF) (2021)<sup>88</sup>:** encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

**B.101 National Planning Practice Guidance (NPPG) (2021)<sup>89</sup>:** reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

**B.102 The Road to Zero (2018)<sup>90</sup>:** sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**B.103 Transport Investment Strategy (2017)<sup>91</sup>:** sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

**B.104 Door to Door: A strategy for improving sustainable transport integration (2013)<sup>92</sup>:** focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

<sup>88</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>89</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>90</sup> HM Government (2018). The Road to Zero. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf))

<sup>91</sup> Department for Transport (2017). Transport Investment Strategy. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/918490/Transport\\_investment\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf))

<sup>92</sup> Department for Transport (2013). Door to Door: A strategy for improving sustainable transport integration. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/142539/door-to-door-strategy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf))



- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

**B.105** The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

**B.106 Department for Transport, Road Investment Strategy 2: 2020-2025 (2020)**<sup>93</sup>: the second Road Investment Strategy sets a long-term strategic vision for the network. It specifies the performance standards Highways England must meet, lists planned enhancement schemes expected to be built and states the funding that will be made available by the DfT during the second Road Period, which covers 2020/21 to 2024/25.

**B.107 The Environment Act 2021**<sup>94</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

**B.108 Decarbonising Transport: A Better, Greener Britain (2021)**<sup>95</sup> The Decarbonisation Transport Plan (DTP) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

**B.109 Department for Transport, Decarbonising Transport: Setting the Challenge (2020)**<sup>96</sup>: sets out the strategic priorities for a new Transport Decarbonisation Plan (TDP), to be published later in 2020, will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP will take a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

**B.110 The Levelling Up and Regeneration Bill (2022)**<sup>97</sup> sets out the direction for planning and makes provision to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

**B.111 The Cycling and Walking Investment Strategy Report to Parliament (2022)**<sup>98</sup> sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling

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<sup>93</sup> Department for Transport (2020). Road Investment Strategy 2: 2020-2025. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/872252/road-investment-strategy-2-2020-2025.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872252/road-investment-strategy-2-2020-2025.pdf))

<sup>94</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>95</sup> Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf))

<sup>96</sup> Department for Transport (2020). Decarbonising Transport Setting the Challenge. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf))

<sup>97</sup> Department for Levelling Up, Housing and Communities (2022) Levelling Up and Regeneration Bill. (<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

<sup>98</sup> Secretary for Transport (2022) Cycling and Walking Investment Strategy Report to Parliament 2022. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf))

the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

### Sub-national

**B.112 Lighting the way to success: The East Kent Local Strategic Partnership (EKLSP) Sustainable Community Strategy (2009)**<sup>99</sup>: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030:

- East Kent will be reaping the benefit of an expanded transport network which closely integrates its unique rail, air, sea and road connections. Benefits will include reduced congestion and less environmental damage.
- Imbalances in the health and life expectancy of East Kent's citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and anti-social behaviour; poor quality, bad managed housing will have been upgraded.

**B.113 Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 (2011)**<sup>100</sup>: sets out Kent County Council's Strategy and Implementation Plans for local transport investment for the period 2011-31. Transport priorities for Dover include the following:

- Dover Western Docks Revival.
- Expansion of car park at Dover Priory Station.
- Dover waterfront link to town centre, including a bridge over the A2.
- A260 upgrade.
- A2 Lydden to Dover improvements.
- Projects to facilitate the Whitfield development (including a Park & Ride and Bus Rapid Transit).
- Improvements to Sandwich Station.
- North Deal A258 Eastern Connecting Road.
- North Deal transport improvements.
- Deal improvements and alternative access routes to complement the A258 corridor.
- Improvements to the A2/A258 Duke of York Roundabout.

**B.114 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)**<sup>101</sup>: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

- Implications and uncertainties regarding post-Brexit border control management.
- Strategic network improvements to the A2/M2 are required to support the new Lower Thames Crossing, the growth of Canterbury and the ports of Dover and Ramsgate.
- The effects of Operation Stack and the risks associated with its implementation (estimated to cost Kent and Medway over £1.5mn per day), including congestion exacerbated by freight traffic and overnight lorry parking.

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<sup>99</sup> East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting\\_the\\_Way\\_to\\_Success\\_The\\_EKLSP\\_Sustainable\\_Community\\_Strategy\\_\(Document\\_Ref\\_A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting_the_Way_to_Success_The_EKLSP_Sustainable_Community_Strategy_(Document_Ref_A85).pdf))

<sup>100</sup> Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

<sup>101</sup> Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0018/80145/GIF-Framework-full-document.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf))

**B.115** The GIF summarises future infrastructure projects in Dover, including transport developments at Western Docks A20 improvements, A256 new Junction, Duke of York Roundabout and projects to facilitate development at Whitfield.

**B.116 Kent Active Travel Strategy, 2018/19 Action Plan (2019)**<sup>102</sup>: seeks to make active travel an attractive and realistic choice for short journeys in Kent. By developing and promoting accessible, safer and well-planned active travel opportunities, this Strategy aims to establish Kent as a pioneering county for active travel:

- Integrating active travel into planning;
- Providing and maintaining appropriate routes for active travel; and
- Supporting active travel in the community.

**B.117 The Kent Design Guide (2008)**<sup>103</sup>: seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. With regard to transport, the Design Guide promotes a sustainable approach to development which requires that location, transport connections, mix of uses and community facilities, together with careful husbanding of land and energy resources all combine to produce social and economic benefits: healthier living and working environments; improved efficiency and productivity in use; and reduction of fuel costs and the costs of vehicle ownership.

**B.118 Kent Rights of Way Improvement Plan (2018-2028)**<sup>104</sup>: the vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. Notable improvements in Dover include the creation of a new England Coat path along the District's coastline and beyond, providing access to the coastline in accordance with the Marine and Coastal Access Act 2009 and upgrades to existing public footpaths associated with the Sholden development, providing access to local schools, Fowlmead Country Park and Deal town centre.

## Local

**B.119 Dover Transport Strategy (2007)**<sup>105</sup>: the primary purpose of this study was to support the development of the Core Strategy, which proposes significant growth for Dover during the period up to 2026. The Strategy includes an assessment of existing and future (with Core Strategy development) transport conditions, the identification, prioritisation and costing of transport proposals, consideration of the transport issues associated with the Whitfield Masterplan, the growth of Dover Port and an assessment of Air Quality. Key elements of the Dover Transport Strategy are:

- A strategic and dynamic routing strategy for Port traffic.
- Improved access to Dover Priory Station and CTRL services.
- A car parking strategy to manage the demand for town centre car trips.
- Park & Ride at Whitfield and A20 approach.
- Improved one-way system.
- Bus only Pencester Road.
- New express bus services (Bus Rapid Transit).
- Coordinated traffic signal control.
- Improved accessibility for pedestrians and cyclists, including major new Townwall Street crossing.
- A strong transport awareness and behavioural change programme.

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<sup>102</sup> Kent County Council (n.d.). Active Travel Strategy. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0007/71773/Active-Travel-Strategy-information.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf))

<sup>103</sup> Kent Design Initiative (2008). The Kent Design Guide. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/12092/design-guide-foreword.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/12092/design-guide-foreword.pdf))

<sup>104</sup> Kent County Council. Kent Rights of Way Improvement Plan 2018-2028 (n.d.). (see <https://www.kent.gov.uk/waste-planning-and-land/public-rights-of-way/projects#tab-1>)

<sup>105</sup> Dover District Council & Partners (2007). Dover Transport Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>)

**B.120** The Dover Transport Strategy is in the process of being reviewed as part of the wider Local Plan. As the strategy develops, its findings will be incorporated into the SA.

**B.121 Dover and Deal Transportation Model (2018)**<sup>106</sup>: Dover District Council in partnership with Kent County Council and Highways England has commissioned a transport model of the settlement of Deal. The model will be developed by extending the existing Dover Transport Model to cover all the key roads, in and around Deal. The model will include a survey of traffic flows to help identify issues such as 'pinch points' and 'rat running'. This information will help to assess the need for new transport infrastructure including possible improved connectivity between Dover and Deal.

**B.122 Active Travel Strategy (2016)**<sup>107</sup>: promotes active travel and sets out how the existing walking and cycling network will be maximised. The overarching ambition of the strategy is to make active travel an attractive and realistic choice for short journeys in Kent by planning for it. Delivering on this ambition will lead to improved health through an increase in physical activity; reduced congestion on the highway network by providing better travel choices; and safer active travel.

## Current baseline

### Road network and congestion hotspots

**B.123** Kent is currently facing increased congestion, on both road and rail. Major routes such as the M20/A20, M2/A2 and A256 form important local and strategic links. However, when these are congested it results in delay on the local network, and can have an impact on the wider strategic network also<sup>108</sup>.

**B.124** The Kent Environment Strategy<sup>109</sup> sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the increased congestion on both road and rail, impacting Kent's economy, health and environment. Major routes such as the M20 and A2/M2 form important local and strategic links for residents and businesses that when congested result in delay on the wider local network.

**B.125** Port traffic is currently routed along the M20/A20, which results in severance between Dover town centre and the harbour, and is associated with air quality concerns owing to its use by heavy goods vehicles before and after the Channel crossing. With the construction of a new Lower Thames Crossing, a second strategic route will be available between Dover and the Midlands and North.

**B.126** The Dover Western Docks Revival Project aims to create a transformed waterfront with a new marina pier and curve to attract a host of shops, bars, cafés and restaurants within Dover's unique backdrop of the harbour, cliffs and castle. The project will also involve the relocation and further development of Dover's cargo business with a new cargo terminal and distribution centre.

**B.127** Port related traffic has a major influence on the town of Dover and the East Kent District as a whole, including the strong seasonal fluctuations in traffic flows during the holiday periods. The A2 approaching the town is of an inferior quality to the rest of the route with sections of single carriageway between Lydden and the Port of Dover. Consequently there is a pressing need for dualling of the remaining sections of single carriageway on the A2 and improvements to the Duke of York's Roundabout and the Whitfield Roundabout. Outside of the District, congestion at Junction 7 of the M2 (Brenley Corner) also affects the area<sup>110</sup>.

**B.128** Following Brexit, uncertainty exists over customs and immigration checks at the Port of Dover and what effect this will have on traffic flow in and out of the area, specifically congestion caused by HGVs transporting goods. An increase in the amount of time it takes to process customs paperwork could result in longer queues, stretching back to Ashford or even further. Work is underway to finalise a solution to alleviate pressure on the road network called 'Operation Stack'.

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<sup>106</sup> WSP (2018). Dover and Deal Transport Model. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/180502-Dover-and-Deal-Transport-Model-ASR-Final-Public.pdf>)

<sup>107</sup> Kent County Council (2016). Active Travel Strategy. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0007/71773/Active-Travel-Strategy-information.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf))

<sup>108</sup> Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

<sup>109</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>110</sup> Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

**B.129** The Council has commissioned WSP to carry out traffic modelling in the District<sup>111</sup>. The transport model models the impact of permitted and projected housing and employment growth in the District over the Plan period, including expansion of the port and other permitted and planned strategic site allocations. The transport model also factors in the impact of planned highway network changes associated with adopted strategic allocations and general traffic alleviations schemes, including the stopping up of Dover Road north of Castle Hill Road, the inclusion of Whitfield Urban Expansion development road, A2 at-grade roundabout with a northbound priority and a new junction on the A256. The modelling reveals that the Whitfield Roundabout and the Duke of York Roundabout primarily, are operating over capacity in the AM and PM peak. It is expected that proposed improvements or mitigation at these roundabouts could reduce the delay and subsequent re-routing along rural routes. WSP, Dover District Council, Kent County Council and Highways England are working loosely together to determine suitable mitigation strategies for the Whitfield and Duke of York Roundabouts.

### Rail network

**B.130** Kent's rail network is divided between the High Speed line that runs from London to continental Europe via Ebbsfleet and Ashford, and the mainline. Recent investment such as the High Speed Rail service has improved access along its corridor to London but further investment is required on the whole network to increase service capacity<sup>112</sup>. Indeed the Growth and Infrastructure Framework<sup>113</sup> states that 17% of all new commuting trips across Kent will be destined for London, a large proportion of which will be by rail. The High Speed rail services from Dover to St Pancras have significantly reduced journey times to London, making the journey more attractive to commuters in particular. However, Dover District Council is pressing for a journey time of less than 1 hour between the two stations, additional capacity on the High Speed route, and investigation into a new Whitfield Station<sup>114</sup>.

### Bus network

**B.131** There is an extensive bus network delivered on a largely commercial basis by a combination of national operators and local companies. Bus services in Dover serve the town and connect to surrounding towns including Canterbury, Deal, Sandwich and Folkestone. Kent's ageing population is increasingly reliant on bus services in particular, as are younger people and those without access to a car<sup>115</sup>. Specific areas of Dover with particularly low levels of car ownership and higher levels of unemployment are found within the wards of St Radigunda, Buckland, Town and Pier, Castle and Tower Hamlets<sup>116</sup>.

**B.132** Dover District Council has been awarded £15.8m from the Government's Housing Infrastructure Fund to support the development of a Bus Rapid Transit System (BRT) between Whitfield, Dover Town Centre and Dover Priory railway station. The development of the Bus Rapid Transit System is designed to take traffic off key local roads and to connect with the growing business community on the White Cliffs Business Park.

**B.133** The BRT includes bridge over the A2 for bus, pedestrian and cycle access, dedicated bus link through White Cliffs Business Park (to Dover Road), widening of Dover Road and a new junction onto Castle Hill Road, Junction Improvements at Castle Hill Road and potential future development of a Public Transport Hub in York Street, Dover.

### Cycle network

**B.134** According to the Dover District Cycling Plan<sup>117</sup>, the road network is under ever increasing pressure particularly in urban areas (approximately 25% of all car journeys are less than 2 miles). As such, there is considerable scope for people to switch to

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<sup>111</sup> WSP (2021). Dover District Council Transport Model Forecasting. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/wsp-dover-and-deal-transport-model-local-plan-forecasting-report-2021.pdf>)

<sup>112</sup> Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

<sup>113</sup> Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf))

<sup>114</sup> Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

<sup>115</sup> Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf))

<sup>116</sup> Dover District Council & Partners (2007). Dover Transport Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>)

<sup>117</sup> Kent Highway Services (2008). Dover District Cycling Plan. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0005/7862/Dover-cycling-strategy.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0005/7862/Dover-cycling-strategy.pdf))

using the bicycle to make journeys, particularly in Deal and Sandwich where there is relatively flat terrain. However, there are physical and geographical barriers in Dover that need to be addressed and overcome. At present, there are two National Cycle Routes and three Regional Routes which either begin or pass through the Dover District.

### Airports

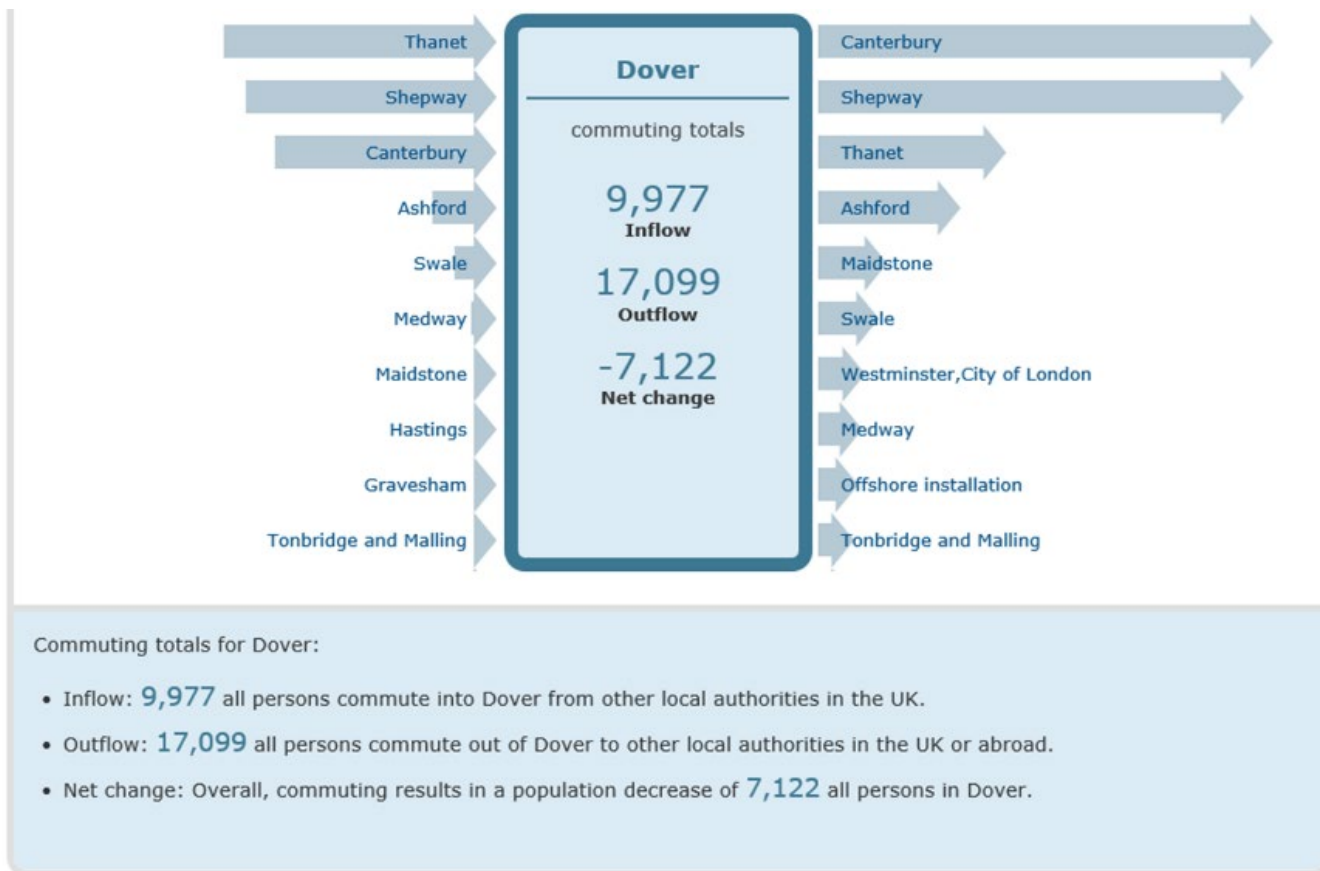
**B.135** There are no airports located within the Dover District. However, there are plans to reopen Manston Airport in the neighbouring District of Thanet as an airfreight hub of national significance.

### Commuting patterns and travel behaviour

**B.136** The District's residents rely heavily on cars to get around and access employment, education, amenities and services. There are many different commuting routes within the Districts and individuals commute in and out of the District from surrounding areas.

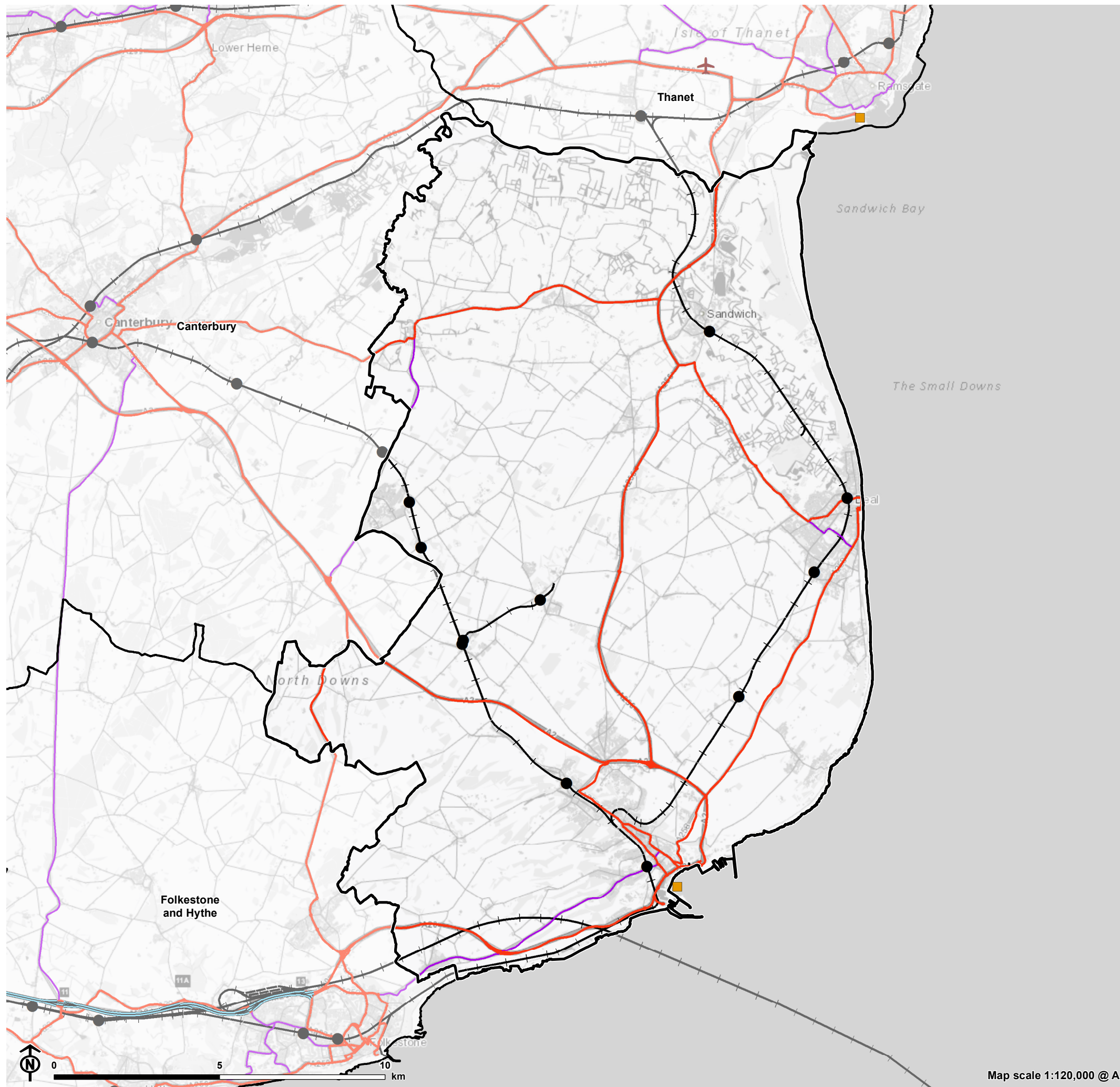
**B.137** As set out in Figure B3, prior to the COVID-19 pandemic, around 9,977 individuals commuted into Dover District, whilst 17,099 commuted out of the District. Therefore, overall, there are 7,122 less people in Dover District as a result of commuting. The commuting figures show the strong relationship that Dover has with Canterbury, Folkestone and Hythe (formally known as Folkestone and Hythe), Thanet and Ashford. These figures are anticipated to have reduced significantly during the COVID-19 pandemic with the introduction of work from home arrangements.

Figure B.3: Location of usual residence and place of work in Dover<sup>118</sup>



<sup>118</sup> NOMIS (2011). Location of usual residence and place of work. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>)

Figure B.4: Transport Links Across the District



- District boundary
- Neighbouring district boundary
- Motorway
- A road
- B road
- Railway track
- Railway station
- Airport
- Port

Map scale 1:120,000 @ A3



## Sustainability issues and likely evolution without the Local Plan

**B.138** Key sustainability issues facing Dover are as follows:

- Port-related congestion along the M20/A20, M2/A2 and A256 is resulting in delays on the local network, which has implications for the wider strategic network. It is also associated with poor air quality. Housing and employment growth have the potential to exacerbate this congestion and the associated air, noise and light pollution it generates (see SA objective 4).
- Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people's access to services, facilities and employment (see SA objective 4).

**B.139** The Local Plan provides an opportunity to update how these issues are addressed over the new Plan period, most notably through the promotion of sustainable locations for development and the provision of sustainable transport infrastructure, which will reduce car dependence and facilitate more walking and cycling, as well as other public transport links.

## SA objectives

Table B.4: Transport connections and travel habits SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA4: To reduce the need to travel and encourage sustainable and active alternative to road vehicles to reduce congestion.	<p>SA4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complementary mix of land uses?</p> <p>SA4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks?</p> <p>SA4.3: Does the Plan facilitate working from home and remote working?</p> <p>SA4.4 Does the Plan help to address road congestion, particularly congestion in locations also suffering from congestion related to Port activity?</p>	<p>Air</p> <p>Climatic Factors</p> <p>Population</p> <p>Human Health</p>

## Air, land and water quality

### Policy context

#### International

**B.140 United Nations Convention on the Law of the Sea (1982)**<sup>119</sup>: international legal framework for all ocean activities, including conservation and resource management.

#### National

**B.141 National Planning Policy Framework (NPPF) (2021)**<sup>120</sup>: sets out the following:

- The planning system should protect and enhance soils in a manner commensurate with their statutory status or quality identified in the development plan.
- New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.
- Despoiled, degraded, derelict, contaminated and unstable land should be remediated and mitigated where appropriate.
- The reuse of previously developed land is encouraged where suitable opportunities exist.
- Plans should take a proactive approach to mitigating and adapting to climate change and ensuring resilience to climate change impacts, and new development should avoid increased vulnerability to the impacts of climate change.

**B.142 National Planning Practice Guidance (NPPG) (2021)**<sup>121</sup>: requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land. It also requires that plan making considers, among other issues: identifying suitable sites for new or enhanced water infrastructure; assessing whether new development is appropriate near to sites used for water infrastructure; and the phasing of new development so that such infrastructure will be in place when and where needed. The impact of water infrastructure on sites designated for biodiversity should also be considered.

**B.143 Waste management plan for England (2013)**<sup>122</sup>: provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

**B.144 Environmental Protection Act 1990**<sup>123</sup>: makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

**B.145 Building Regulations (1990)**<sup>124</sup>: requires that reasonable precautions are taken to avoid risks to health and safety caused by contaminants in ground to be covered by building and associated ground.

**B.146 National Planning Policy for Waste (NPPW) (2014)**<sup>125</sup>: key planning objectives are identified within the NPPW, requiring planning authorities to:

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<sup>119</sup> UN (1982). B.131 United Nations Convention on the Law of the Sea. (see [https://www.un.org/depts/los/convention\\_agreements/texts/unclos/unclos\\_e.pdf](https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf))

<sup>120</sup> Department for Levelling Up, Housing and Communities (last updated 19 June 2019). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf))

<sup>121</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>122</sup> Department for Environment, Food and Rural Affairs (2013). Waste management plan for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf))

<sup>123</sup> HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

<sup>124</sup> HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

<sup>125</sup> Department for Communities and Local Government (2014). National Planning Policy for Waste. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf))

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns
- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

**B.147 Water White Paper (2012)**<sup>126</sup>: sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

**B.148 Water for Life White Paper (2011)**<sup>127</sup>: sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short and longer term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

**B.149 National Policy Statement for Waste Water (2012)**<sup>128</sup>: sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**B.150 Future Water: The Government's Water Strategy for England (2008)**<sup>129</sup>: sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

**B.151 The Nitrate Pollution Prevention Regulations (2016)**<sup>130</sup>: provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when

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<sup>126</sup> Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>)

<sup>127</sup> Department for Environment, Food and Rural Affairs (2011). Water for life. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228861/8230.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf))

<sup>128</sup> HM Government (2012). National Policy Statement for Waste Water. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf))

<sup>129</sup> HM Government (2008). Future Water: The Government's water strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf))

<sup>130</sup> HM Government (2016). The Nitrate Pollution Prevention Regulations. (see <https://www.legislation.gov.uk/uksi/2015/668/contents/made>)

to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**B.152 The Urban Waste Water Treatment Regulations (2003)**<sup>131</sup>: protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

**B.153 The Water Environment Regulations (2016)**<sup>132</sup>: protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process.

**B.154 The Water Supply (Water Quality) Regulations (2016)**<sup>133</sup>: focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

**B.155 The Environmental Permitting Regulations (2016)**<sup>134</sup>: streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

**B.156 The Air Quality Standards Regulations (2016)**<sup>135</sup>: set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**B.157 The Environmental Noise Regulations (2018)**<sup>136</sup>: apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at work places; inside means of transport; or military activities in military areas.

**B.158 The Waste (Circular Economy) Regulations (2020)**<sup>137</sup>: seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

**B.159 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)**<sup>138</sup>: sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

<sup>131</sup> HM Government (2003). The Urban Waste Water Treatment Regulations. (see <https://www.legislation.gov.uk/ukksi/1994/2841/contents/made>)

<sup>132</sup> HM Government (2016). The Water Environment (England and Wales) Regulations. (see <https://www.legislation.gov.uk/ukksi/2017/407/contents/made>)

<sup>133</sup> HM Government (2016). The Water Supply (Water Quality) Regulations. (see <https://www.legislation.gov.uk/wsi/2018/647/contents/made>)

<sup>134</sup> HM Government (2016). The Environmental Permitting Regulations. (see <https://www.legislation.gov.uk/ukksi/2016/1154/contents/made>)

<sup>135</sup> HM Government (2016). The Air Quality Standards Regulations. (see <https://www.legislation.gov.uk/ukksi/2010/1001/contents/made>)

<sup>136</sup> HM Government (2018). The Environmental Noise (England) Regulations. (see <https://www.legislation.gov.uk/ukksi/2006/2238/contents/made>)

<sup>137</sup> HM Government (2020). The Waste (Circular Economy) Regulations. (see <https://www.legislation.gov.uk/ukksi/2020/904/contents/made>)

<sup>138</sup> Department for Environment Food and Rural Affairs (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf))

**B.160 Safeguarding our Soils – A Strategy for England (2009)**<sup>139</sup>: sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

**B.161 The Water White Paper (2012)**<sup>140</sup>: provides out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

**B.162 National Policy Statement for Waste Water (2012)**<sup>141</sup>: sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**B.163 Future Water: The Government's water strategy for England (2008)**<sup>142</sup>: sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

**B.164 A Green Future: Our 25 Year Plan to Improve the Environment (2018)**<sup>143</sup>: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

- Using and managing land sustainably:
- Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
- Protect best agricultural land.
- Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
- Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
- Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

**B.165 The Environment Act 2021**<sup>144</sup>: is a key vehicle for delivering the bold vision set out in the 25 Year Environment Plan. An important aspect of the Environment Act is the power to set long-term, legally-binding environmental targets. Setting targets will provide a strong mechanism to deliver long-term environmental outcomes. It requires government to set at least one target in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction, as well as a target for fine particulate matter (PM2.5). These targets need to be brought forward by 31 October 2022. Long-term targets will be supported by interim targets, which will set a five year trajectory towards meeting the long-term targets.

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<sup>139</sup> Department for Environment, Food and Rural Affairs (2009). Safeguarding our Soils: A Strategy for England. (see <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>)

<sup>140</sup> Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://www.water.org.uk/water2050/>)

<sup>141</sup> HM Government (2012). National Policy Statement for Waste Water. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf))

<sup>142</sup> HM Government (2008). Future Water: The Government's water strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf))

<sup>143</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf))

<sup>144</sup> The Environment Act (2021). (see [https://www.legislation.gov.uk/ukpga/2021/30/pdfs/ukpga\\_20210030\\_en.pdf](https://www.legislation.gov.uk/ukpga/2021/30/pdfs/ukpga_20210030_en.pdf))

**B.166 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)**<sup>145</sup>: sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESVs), a £290 million National Productivity

**B.167 Investment Fund**, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

**B.168 Clean Air Strategy 2019 (2019)**<sup>146</sup>: sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

**B.169 Department for Transport, The Road to Zero (2018)**<sup>147</sup>: sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**B.170 Our Waste, Our Resources: A strategy for England (2018)**<sup>148</sup>: aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

### Sub-national

**B.171 Kent Environment Strategy (2016)**<sup>149</sup> sets the following targets in relation to the quality of the environment:

- Decrease the number of days of moderate or higher air pollution and the concentration of pollutants (align with the Kent and Medway Air Quality Partnership and national monitoring standards)
- Work to reduce the noise exposure from road, rail and other transport
- Reduce water use from 160 to 140 litres per person per day
- 28 Kent and Medway water bodies will be at good status by 2021.

**B.172 Kent and Medway Growth and Infrastructure Framework (GIF) (2015)**<sup>150</sup>: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The document identifies issues with capacity for treating sewage arising from new houses at Whitfield.

**B.173 Kent Minerals and Waste Local Plan 2013-30 (2016)**<sup>151</sup>: describes (1) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent; and (2) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. It also contains a map showing whether the Minerals Safeguarding Areas are located within the District (see Current baseline). The most commonly safeguarded mineral in Dover is Brickearth, found across the District but particularly to the north-west of Deal.

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<sup>145</sup> Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf))

<sup>146</sup> DEFRA (2019). Clean Air Strategy 2019. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf))

<sup>147</sup> Department for Transport (2018). The Road to Zero. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf))

<sup>148</sup> Department for Environment Food and Rural Affairs and Environment Agency (2018). Resource and waste strategy for England. (see <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>)

<sup>149</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>150</sup> Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf))

<sup>151</sup> Kent County Council (2016). Kent Minerals and Waste Local Plan 2013-30. (see <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy>)

**B.174 River Basin Management Plan for the South East River Basin District (2009)**<sup>152</sup>: this plan outlines the pressures facing the water environment in the South East Reiver Basin District and the actions which will be used to address them.

**B.175 Climate Local Kent Commitment (n.d.)**<sup>153</sup>: this document highlights the role that Kent County Council has in helping residents capture the opportunities and benefits of action on climate change. This commitment pledges to:

- Set locally owned commitments and actions to reduce carbon emissions;
- Public actions and progress regularly;
- Share learning with other organisations; and
- Regularly refresh commitments and actions to ensure they are up to date and relevant.

**B.176 Kent and Medway Shoreline Pollution Emergency Plan (2022)**<sup>154</sup> outlines an overarching policy framework for coastal shoreline pollution planning and response in Kent and Medway. The objectives of this Plan are:

- To outline organisational responsibilities for shoreline pollution planning and response;
- To provide emergency points of contact;
- To determine relevant operational requirements of agencies in Kent;
- To ensure the availability of personnel for effective co-ordination and delivery of the response;
- To ensure that appropriate personnel are trained and exercised;
- To ensure that liaison takes place across key partners;
- To ensure effective planning for, and operational interventions to, pollution incidents impacting Kent's natural and built coastal environment; and
- To collate existing zonal shoreline access and sensitivity information and booming plans for Kent and Medway in one document.

## Local

**B.177 Dover Air Quality Action Plan (2020)**<sup>155</sup>: the aim of this Action Plan is to identify how Dover District Council will use its existing powers and work together with other organisations in pursuit of the annual mean Air Quality Objective for nitrogen dioxide (NO<sub>2</sub>). Measures are proposed to improve air quality both within the AQMA and throughout the District as a whole. The direct measures proposed for the AQMA are:

- Improved traffic management through junction improvements
- Dualling of the A2 between Lydden and Dover
- Strategic Signage Improvements
- Improvements to Eastern Docks Layout
- New Dover Eastern Docks Exit Road to A20 Townwall Street
- Consideration of the effects of the development of a Port Buffer Zone
- Consideration of the effects of an expansion to the Western Docks

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<sup>152</sup> Environment Agency (2009). Water for life and livelihoods: River Basin Management Plan South East River Basin District. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718337/South\\_East\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf))

<sup>153</sup> Kent County Council (n.d.). Climate Local Kent Commitment – Annex 1 (see <https://democracy.thanet.gov.uk/documents/s29928/Climate%20Local%20Kent%20Commitment%20-%20Annex%201.pdf>)

<sup>154</sup> Kent County Council (2022). Shoreline Pollution Emergency Plan. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0007/47806/Kent-and-Medway-Shoreline-Pollution-Emergency-Plan.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0007/47806/Kent-and-Medway-Shoreline-Pollution-Emergency-Plan.pdf))

<sup>155</sup> Dover District Council (2020). Dover Air Quality Annual Status Report. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Home.aspx>)

- Transfer of freight from road to rail.

**B.178** The general measures to improve air quality across the whole District are:

- DDC will encourage Council Travel Plan opportunities and seek to facilitate uptake of sustainable modes of transport.
- DDC will continue to work together with Kent County Council (KCC) to encourage the uptake of Employer and School Travel Plans within the District.
- DDC will continue to work with KCC to improve the facilities for cycling and walking within Dover and encourage greater uptake.
- DDC Environmental Health will continue to work closely with the Planning Department to ensure that air quality is taken into account in the planning process when located in or close to the AQMA or in areas marginally below air quality objectives.
- DDC will continue to work together with developers to improve sustainable transport links serving new developments.
- DDC will develop, through the Kent & Medway Air Quality Partnership, supplementary planning guidance to assist with air quality assessments of development proposals.
- DDC will continue to work together with KCC to improve public transport services and encourage the use of more sustainable transport modes.
- DDC will continue their commitment to local air quality monitoring within the District to ensure a high standard of data is achieved to assess against air quality objectives.
- DDC will make details of the Action Plan measures and annual progress reports available on the website to ensure broad access to the consultation and implementation process.
- DDC will continue to work together with the Kent and Medway Air Quality Partnership on promotional activities to raise the profile of air quality in Dover.
- DDC will continue to work together with the Kent Energy Centre to promote and implement energy efficiency measures in Dover.

## Current baseline

### Air quality

**B.179** The Kent Environment Strategy<sup>156</sup> highlights Kent's unique challenge presented by the county's position between London and the continent. Easterly winds can bring pollution from cross-channel freight and the continent and westerly winds bring pollution from London. There are currently 40 air quality management areas in the county where air pollutants have been known to exceed objectives set by Government.

**B.180** There are currently two Air Quality Management Areas (AQMAs) declared in the District due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO<sub>2</sub>, caused primarily by road traffic emissions. They are:

- A20 AQMA (declared in 2004 and amended in 2007 and 2009); and
- High Street/Landwell AQMA (declared in 2007).

### NO<sub>2</sub>

**B.181** For NO<sub>2</sub> there are two predicted exceedances of the AQS objective at specific receptors, all of which lie within existing AQMAs. As such, there are no new exceedance areas that the Council has not previously identified<sup>157</sup>.

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<sup>156</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>157</sup> Bureau Veritas (2012). Air Quality Assessment in the Dover Area. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Air-Quality-Assessment-v4.pdf>)



**B.182** There was one exceedance of the NO<sub>2</sub> annual mean objective in 2019, this was located outside of an AQMA at DV30 adjacent to 19B High Street Dover, slightly to the north of the High Street/Ladywell AQMA boundary. As this is the third year that an exceedance has been identified here, consideration is being given to extending the AQMA towards Victoria Crescent to include this area of exceedance.

#### PM10

**B.183** The Air Quality Assessment found that there were no exceedances of PM10 AQS objective. As such, there is no requirement to declare an AQMA for this pollutant.

**B.184** Figure B5 illustrates the location of the air quality management areas in the District.

**B.185** An updated Air Quality Study assessing the likely implications of the Publication Local Plan's preferred development sites on local air quality has been undertaken by Bureau Veritas (2020). The work concludes that the implementation of mitigation measures in line with the Kent and Medway guidance should avoid or minimise air quality enough to eliminate the potential for significant adverse deterioration in local air quality.

### Land quality

#### Agricultural land quality

**B.186** A large proportion of Dover District is agricultural land, which is mainly used for arable farming<sup>158</sup>.

**B.187** The agricultural land in Sandwich is particularly important and recognised by the Agricultural Land Classification as Grade 1, 'the best and most versatile quality'. However, a significant area of this is at risk of flooding from both fluvial and tidal flooding. As well as good quality agricultural land, there are large areas of managed grassland and forestry within the District<sup>159</sup>. Figure B6 illustrates the agricultural land classifications across the District.

#### Soils and minerals

**B.188** The north, north-western and eastern sides of Dover District, north of Ash and south-east of Sandwich, are dominated by poor quality, heavy, Marine/Estuarine Alluvium clay, overlain by seasonally wet deep clay soils. The north-east coast of the District, adjacent to Sandwich Flats, comprises bands of Marine/Estuarine Alluvium and Storm Gravel Beach Deposits. Alluvial and peat soils surround the dykes and marshland of Hacklinge, as well as the land adjacent to the Little Stour River, along the north-western section of the District. A small section of peaty soil lies over the Alluvium bed to the west of Sholden, to the east of the District<sup>160</sup>.

**B.189** Head Brickearth dominates the west of the District around Stourmouth and Preston, overlain with seasonally wet deep loam to clay. Swathes of Thanet beds, Woolwich Beds and Head Brickearth cover the northern central area of the District, west of Sandwich, overlain again with seasonally wet deep loam to clay. Smaller patches of Clay with Flints appear amidst the swathes, adding to the variation with silty soil<sup>161</sup>.

**B.190** The southern central section of the District, south and west of Deal and north of Dover, encompassing Aylesham, Kingsdown, Nonington and Sheperdswell, supports generally well drained, good quality chalk of varying depths and silty soil. A distinct pattern of narrow strips of dry valley and Nailbourne Deposits, and wider bands of Head, follow a northeast direction north of a band of Clay with Flints at the very south of the site. The band of Clay with Flints supports deep loam to clay soil. Shallow silty soils lie across the Upper Chalk at the very south of the site<sup>162</sup>.

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<sup>158</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>159</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>160</sup> Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

<sup>161</sup> Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

<sup>162</sup> Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

**B.191** The minerals that are safeguarded across the District are Brickearth, Sub-Alluvial River Terrace Deposits and Storm Beach Gravel. The most commonly safeguarded mineral is Brickearth, found across the District but particularly to the north-west of Deal.

### Water resource

**B.192** Dover District is located on the south coast of Kent, bordered by the English Channel for much of its boundary, the Stour Estuary to the north and Folkestone and Hythe District to the south. The District is underlain by chalk, which provides groundwater for public water supply. The following main rivers are located in Dover District: River Dour, River Wingham, River Stour, North Stream, South Stream, Delf, Penfield Sewer, Brook Stream and Minnis Sewer.

**B.193** Drinking water is supplied wholly by groundwater sources from the underlying chalk in Kent. Dover is located in the Environment Agency's Stour Catchment Abstraction Management Strategy, which identifies that all the groundwater sources are over-abstracted.

**B.194** The Kent Environment Strategy<sup>163</sup> names Kent as one of the driest regions in England and Wales. Kent's household water use is above the national average (154 litres per person per day compared with 141 litres nationally). Kent's water resources are under continued pressure requiring careful management and planning. Dover falls partly within the Dour Water Resource Zone (Affinity Water) and the Thanet Water Resource Zone (Southern Water), both of which will experience a shortfall in supply relative to demand up to 2031<sup>164</sup>.

**B.195** Future demand will be greatly affected by the water efficiency of new and existing homes. Southern Water and Affinity Water have undertaken detailed modelling work in order to account for proposed housing growth and environmental conditions and have published robust strategies outlining how they will accommodate growth in their respective catchments with a range of factors and future scenarios considered<sup>165</sup>. Some water bodies within the Dover District have been classified by the Environment Agency as at Moderate or Serious Water Stress, meaning either the current household demand for water is high as a proportion of the current effective rainfall available to meet that demand; or, the future household demand is likely to be a high proportion of the effective rainfall available to meet that demand<sup>166</sup>. While water companies are able to move water around their networks so that the status of individual water bodies is only indirectly relevant to supply. Water companies across the whole of south east England (including Affinity and Southern Water) have been classified as under Serious Water Stress<sup>167</sup>.

### Water quality

**B.196** The Dour was classified as 'Poor' in 2016, driven by a 'Poor' status for fish and a 'moderate' status for phosphate, a deterioration from 'moderate' scores in 2013 and 2014. The chemical status of the Dour had improved to 'good' after failing in this category in 2013 and 2014. The Dour's RNAGs included barriers, groundwater abstraction, and intermittent sewage discharge and misconnections.

**B.197** The River Stour was also classified as 'Poor' in 2016, driven by 'poor' scores for ecology, fish, and high levels of pollutants. The main issues preventing the Stour reaching 'good' status were pollution from agriculture and physical modifications.

**B.198** The Wingham and Little Stour were also classified as 'poor' in 2016, driven by poor ratings for fish and 'high' concentrations of pollutants. However the chemical status of the Wingham and Little Stour remained good throughout the monitoring period (2013-2016). Reasons for not achieving good status for the Wingham and Little Stour in 2016 were barriers to fish movement, poor phosphate status and groundwater abstraction leading to reduced flow, and ammonia from water industry point source pollution<sup>168</sup>.

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<sup>163</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>164</sup> AECOM (2017). Kent Water for Sustainable Growth Study. (see [https://www.medway.gov.uk/download/downloads/id/2374/kent\\_water\\_for\\_sustainable\\_growth\\_2017.pdf](https://www.medway.gov.uk/download/downloads/id/2374/kent_water_for_sustainable_growth_2017.pdf))

<sup>165</sup> Dover District Council (2020). Water Cycle Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

<sup>166</sup> AECOM (2017). Kent Water for Sustainable Growth Study. (see [https://www.medway.gov.uk/download/file/2374/kent\\_water\\_for\\_sustainable\\_growth\\_2017](https://www.medway.gov.uk/download/file/2374/kent_water_for_sustainable_growth_2017))

<sup>167</sup> HM Government. Water Stressed Areas: 2013 classification. (see <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>)

<sup>168</sup> Dover District Council (2020). Water Cycle Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

**B.199** Kent's Water for Sustainable Growth Study<sup>169</sup> demonstrates that a large proportion of water bodies in Kent are failing to meet the Water Framework Directive objective of 'Good Status'. This is due to a number of reasons such as pressures ranging from physical modification, to pollution and over-abstraction. The Environment Agency's River Basin Management Plans shows that despite measures completed over the last 6 years, that are providing some benefits, there has been a reduction in the number of water bodies with a 'good' status<sup>170</sup>. Increases in wastewater flows are expected across Dover, following development. This is largely due to the expected reduction in both occupancy rates and per capita consumption. However, the Kent Water for Sustainable Growth Study (2016) identified that all the WwTWs in the District have sufficient capacity to accept the additional wastewater flow from forecast housing growth<sup>171</sup>.

**B.200** In December 2019, Natural England issued guidance to Local Authorities within the Stour Catchment due to high levels of nitrogen and phosphorus in the water environment at Stodmarsh in neighbouring Canterbury. It is therefore recommended that all developments in the catchment should seek to deliver nutrient neutrality. This covers the north western corner of Dover District specifically the Little Stour and Wingham catchment and catchment of the Dambridge WwTW. The Council is therefore obtained hydrological advice to determine the significance of the hydrological connection between Dover District and Stodmarsh. The Stodmarsh Water Quality Modelling (2021)<sup>172</sup> study seeks to determine if there is potential for a hydraulic connection enabling water discharged from Dambridge WwTW to reach Stodmarsh and enter the freshwater lakes. The study found there is potential for a connection between Dambridge WwTW and Stodmarsh under extreme conditions, including intermittent periods of high tidal range and low river flow when the propagation of tide upstream is greatest. However, the study highlights that when connectivity would occur, dilution would be so great that any nutrients released from the WwTW would be undetectable.

**B.201** Southern Water are currently carrying out a project in Whitfield to overcome the foul issues that would be caused by increased housing during the timeline of the Local Plan. The aim of the project is to provide storage upstream of Sandwich Road pumping station that will prevent the flooding of the local properties.

**B.202** Source Protection Zones 1-3 are located within the District, collectively protecting the District's water supply, rivers and aquifers from pollution. The majority of the zones are concentrated in the southern third of the District, with a significant concentration to the north and north-west of Dover. Figure B5 illustrates the location of the source protection zones in the District.

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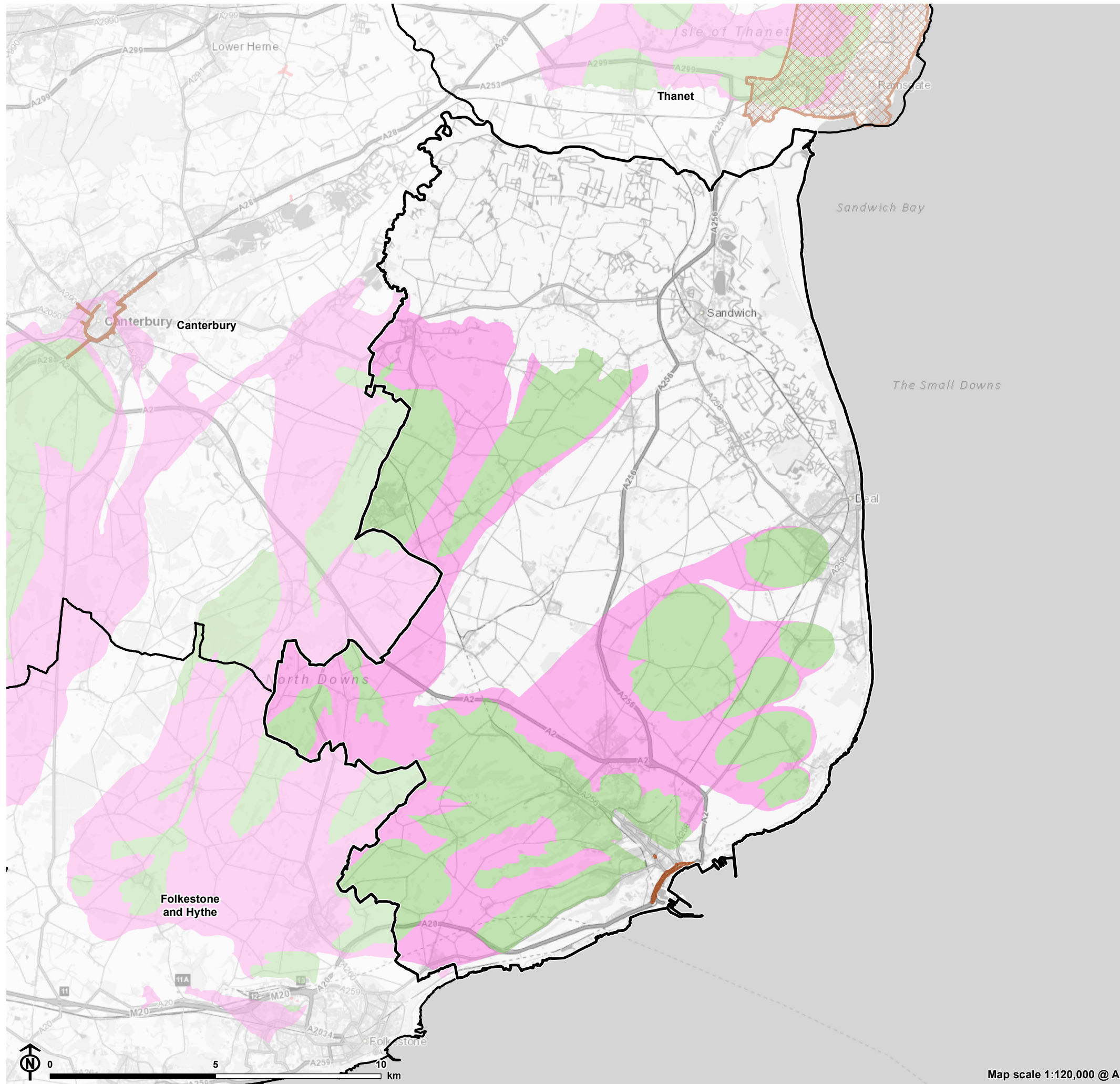
<sup>169</sup> AECOM (2017). Kent Water for Sustainable Growth Study. (see [https://www.medway.gov.uk/download/downloads/id/2374/kent\\_water\\_for\\_sustainable\\_growth\\_2017.pdf](https://www.medway.gov.uk/download/downloads/id/2374/kent_water_for_sustainable_growth_2017.pdf))

<sup>170</sup> Environment Agency (2019). South East River Basin Management Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718337/South\\_East\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf))

<sup>171</sup> AECOM (2017). Kent Water for Sustainable Growth Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

<sup>172</sup> APEM Ltd (2021). Stodmarsh Water Quality Modelling Dover District County Council. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/P6031-River-Stour-Connectivity-Study-Nov2021.pdf>)

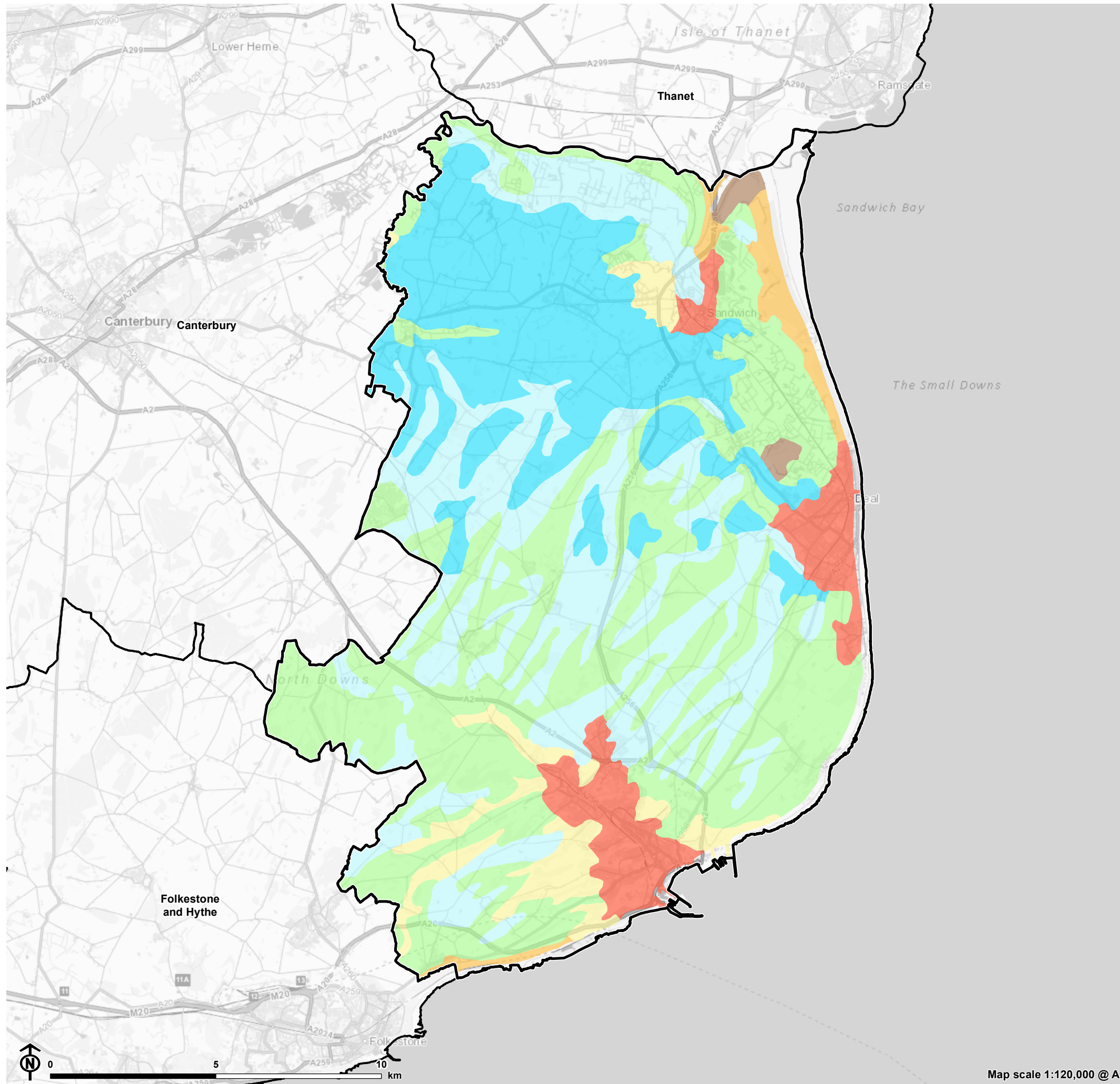
Figure B.5: Air Quality Management Areas and Source Protection Zones



- District boundary
- Neighbouring district boundary
- Air Quality Management Area
- Source Protection Zone**
- Zone I - Inner protection zone
- Zone II - Outer protection zone
- Zone III - Total catchment
- Zone of special interest

Map scale 1:120,000 @ A3

Figure B.6: Agricultural Land Classification



- District boundary
- Neighbouring district boundary
- Agricultural Land Classification**
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non agricultural
- Urban

Map scale 1:120,000 @ A3

## Sustainability issues and likely evolution without the Local Plan

**B.203** Key sustainability issues facing the District are as follows:

- The District contains some of the county’s best and most versatile agricultural land, most notably around Sandwich, as well as many valuable mineral reserves. The Local Plan provides an opportunity to ensure that these natural assets are not lost or compromised by future growth in the District by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile (see SA objective 5).
- The District’s Source Protection Zones are concentrated in the southern third of the District, with a significant concentration of Zones to the north-west of Dover. The Local Plan provides an opportunity to direct inappropriate development away from Source Protection Zones (see SA objective 5).
- There are two Air Quality Management Areas in Dover District, which have been designated because these areas exceed the annual mean Air Quality Strategy objective for nitrogen dioxide caused primarily by road traffic emissions. The Local Plan provides an opportunity to set out measures to mitigate these exceedances without inhibiting the need for the District to grow (see SA objective 6).
- Groundwater sources in Dover District are over-abstracted. Dover falls within the Dour WRZ and Thanet WRZ, both of which will experience a shortfall in supply relative to demand up to 2031. A Local Plan provides an opportunity to ensure that water efficiency measures are implemented over the Plan period (see SA objective 5).
- Water bodies in Dover are failing to meet the Water Framework Directive objective of ‘Good Status’. A Local Plan provides an opportunity to implement plans to improve water quality (see SA objective 5).

**B.204** Small increases in wastewater flows are expected across Dover District, following future development. However, the capacity of the sewerage network could pose a threat to meeting these future development needs, particularly in Whitfield, although work is underway to resolve these issues. The Local Plan provides an opportunity to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Whitfield area) is put in place (see SA objective 5).

## SA objectives

Table B.5: Air, land and water quality SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA5: To promote sustainable forms of development that maintain and improve the quality of the District’s natural resources, including minerals, soils and waters.	<p>SA5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land?</p> <p>SA5.2: Does the Plan prioritise development of poorer quality agricultural land of the District’s best and most versatile agricultural land?</p> <p>SA5.3: Does the Plan minimise development in mineral safeguarding areas?</p> <p>SA5.4: Does the Plan direct inappropriate development away from Source Protection Zones?</p> <p>SA5.5: Does the Plan minimise water use?</p> <p>SA5.6: Does the Plan address capacity issues in the District’s wastewater infrastructure, most notably at Whitfield, and safeguard and enhance the quality of the District’s ground, surface and coastal waters?</p> <p>SA5.7: Does the Plan encourage the reuse and sourcing of local materials?</p> <p>SA5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</p>	<p>Soil</p> <p>Water</p> <p>Biodiversity</p> <p>Human Health</p> <p>Flora and Fauna</p> <p>Landscape</p>
SA6: To reduce air pollution and ensure	SA6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?	<p>Air</p> <p>Climatic Factors</p>

Appendix B  
Detailed Sustainability and Policy Context

Publication Dover District Local Plan (Reg 19)  
September 2022

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
air quality continues to improve.		Human Health

## Climate change adaptation and mitigation

### Policy context

#### International

**B.205 United Nations Paris Climate Change Agreement (2015)**<sup>173</sup>: international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

#### National

**B.206 National Planning Policy Framework (NPPF) (2021)**<sup>174</sup>: contains the following:

- One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.
- Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.
- Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

**B.207 National Planning Practice Guidance (NPPG) (2021)**<sup>175</sup>: supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport. With regard to flood risk, a significant update was made to the NPPG in August 2022. The update follows the government's 'Review of policy for development in areas at flood risk'<sup>176</sup>, which committed to a "significantly revised and updated" flood risk planning practice guidance. Changes were also made following reviews such as the Jenkins Review<sup>177</sup>, Public Accounts Committee Review<sup>178</sup> and the EFRA Committee Review<sup>179</sup>. According to the updated guidance:

- The Sequential Test has been expanded to include the requirement to assess all sources of flooding at medium and high-risk both now and in the future, including surface water. The test applies a hierarchical approach to locating development in areas at low-risk of flooding from any source, then medium-risk, then, as a last resort, high-risk areas.
- The Exceptions Test is to only be applied if the Sequential Test has shown that there are no reasonably available, lower-risk sites, suitable for the proposed development, to which the development could be steered. Wider sustainability benefits must be demonstrated, including multifunctional SuDS that significantly exceed the requirements of the NPPF, and a requirement to reduce overall flood risk to satisfy the test. Development must be made safe throughout its lifetime, without increasing flood risk elsewhere.
- Strategic Flood Risk Assessments should now also be used to inform the allocation of land to be safeguarded for future flood risk management, including natural flood management, particularly where development has the potential to prevent,

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<sup>173</sup> UN (2015). Paris Climate Change Agreement. (see <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>)

<sup>174</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>175</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf))

<sup>176</sup> Defra, MHCLG and the Environment Agency (2021). Review of policy for development in areas at flood risk. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1006735/Review\\_of\\_Policy\\_for\\_Development\\_in\\_areas\\_at\\_flood\\_risk.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1006735/Review_of_Policy_for_Development_in_areas_at_flood_risk.pdf))

<sup>177</sup> Defra (2021). Surface water and drainage: review of responsibilities. (see <https://www.gov.uk/government/publications/surface-water-and-drainage-review-of-responsibilities>)

<sup>178</sup> Public Accounts Committee (2021). Managing flood risk. (see <https://publications.parliament.uk/pa/cm5801/cmselect/cmpublic/931/93102.htm>)

<sup>179</sup> EFRA Committee (2021). Flooding. (see <https://publications.parliament.uk/pa/cm5801/cmselect/cmenvfru/170/17002.htm>)



hinder or help to enable their delivery. Further to this, they should inform policies for change of use and reducing the causes and impacts of flooding, whilst also demonstrating how the adaptation to climate change has been met.

- Requirements for on-site level-for-level compensatory storage where flood storage from any source of flooding is lost, and the need to safely manage flow routes within a site where these would be deflected or constricted by development.
- A presumption that all major developments will provide multifunctional SuDS and an expectation that major developments will provide evidence where multifunctional SuDS are not provided. There is an expectation that SuDS will reduce the causes and impacts of flooding, including reducing surface water loadings on the existing sewerage network, e.g. by incorporating runoff from adjacent developments into the SuDS, maximising infiltration, maximising planting and vegetated areas and providing additional attenuation beyond the minimum requirements.
- Stronger guidance on multifunctional SuDS. The definition of multifunctional SuDS is expanded beyond the '4 pillars' (i.e. water quantity, water quality, amenity and biodiversity), including contributing to biodiversity net gain, sequestering carbon and reducing urban heating and air pollution.
- New guidance on natural flood management, with an expectation that strategic plans and new development will deliver natural flood management, with local planning authorities using planning conditions and obligations to secure it.
- New guidance on flood resistance and resilience measures, where it is not possible to avoid areas at risk of flooding from any source.

**B.208 Planning Act 2008<sup>180</sup>:** The Planning Act 2008 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018. Section 182 places a legal duty on local planning authorities to ensure that their development plan documents include policies to ensure that development and use of land in their area contributes to the mitigation of, and adaptation to, climate change.

**B.209 Planning and Energy Act 2008<sup>181</sup>:** enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

**B.210 Climate Change Act 2008<sup>182</sup>:** sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline.

**B.211 The Energy Performance of Buildings Regulations (2021)<sup>183</sup>:** seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**B.212 The Flood and Water Management Act 2010<sup>184</sup>:** sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**B.213 The UK Renewable Energy Strategy (2009)<sup>185</sup>:** sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

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<sup>180</sup> HM Government (2008). Planning and Energy Act 2008. (see <https://www.legislation.gov.uk/ukpga/2008/21>)

<sup>181</sup> HM Government (2008). Climate Change Act 2008. (see [https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\\_20080027\\_en.pdf](https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf))

<sup>182</sup> HM Government (2008). Climate Change Act 2008. (see [https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\\_20080027\\_en.pdf](https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf))

<sup>183</sup> HM Government (2021). The Energy Performance of Buildings Regulations. (see <https://www.legislation.gov.uk/uksi/2021/3118/contents/made>)

<sup>184</sup> HM Government (2010). Flood and Water Management Act 2010. (see [http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga\\_20100029\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf))

<sup>185</sup> HM Government (2009). The UK Renewable Energy Strategy. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228866/7686.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf))

**B.214 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)**<sup>186</sup>: aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

**B.215 The Flood and Water Management Act 2010**<sup>187</sup> and **The Flood and Water Regulations (2011)**<sup>188</sup>: sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**B.216 The Net Zero Strategy: Build Back Greener (2021)**<sup>189</sup> sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

**B.217 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)**<sup>190</sup>: sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

**B.218 UK Climate Change Risk Assessment (2017)**<sup>191</sup>: sets out six priority areas needing urgent further action over the next five years in order to minimise risk from the effects of climate change. These priority areas include: flooding and coastal change risk to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of

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<sup>186</sup> Department of Energy & Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf))

<sup>187</sup> HM Government (2010). Flood and Water Management Act. (see <https://www.legislation.gov.uk/ukpga/2010/29/contents>)

<sup>188</sup> HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf))

<sup>189</sup> Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see <https://www.gov.uk/government/publications/net-zero-strategy>)

<sup>190</sup> HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf))

<sup>191</sup> HM Government (2017). UK Climate Change Risk Assessment. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf))

shortages in the public water supply and for agriculture, energy generation and industry; risks to natural capital; risks to domestic and international food production and trade; and new and emerging pests and diseases and invasive species.

**B.219 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)**<sup>192</sup>: this Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

**B.220 A Green Future: Our 25 Year Plan to Improve the Environment (2018)**<sup>193</sup>: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

**B.221 The national flood and coastal erosion risk management strategy for England (2011)**<sup>194</sup>: this Strategy builds on existing approaches to flood and coastal risk management and promotes the use of a wide range of measures to manage risk. The strategy forms the framework within which communities have a greater role in local risk management decisions and sets out the Environment Agency's strategic overview role in flood and coastal erosion risk management.

**B.222 The Environment Act 2021**<sup>195</sup> sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

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<sup>192</sup> HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf))

<sup>193</sup> HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf))

<sup>194</sup> Environment Agency (2011). Understanding the risks, empowering communities, building resilience. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf))

<sup>195</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

**B.223 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)**<sup>196</sup>: this Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

**B.224 The 25 Year Environment Plan (2020)**<sup>197</sup> sets out policy priorities with respect to: responding to climate change and using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

**B.225 The UK Low Carbon Transition Plan: national Strategy for Climate and Energy (2009)**<sup>198</sup>: sets out a five point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

**B.226 The Industrial Decarbonisation Strategy (2021)**<sup>199</sup>: aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

**B.227** The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions.

**B.228** Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions;
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass;
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors;
- To ensure the land planning regime is fit for building low carbon infrastructure;

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<sup>196</sup> HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf))

<sup>197</sup> Defra (2021). A Green Future: Our 25 Year Plan to Improve the Environment. (see <https://www.gov.uk/government/publications/25-year-environment-plan>)

<sup>198</sup> HM Government (2009). The UK Low Carbon Transition Plan. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228752/9780108508394.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf))

<sup>199</sup> Department for Business, Energy & Industrial Strategy (2021). Industrial decarbonisation strategy. (see <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

- Support the skills transition so that the UK workforce benefits from the creation of new green jobs;
- An expectation that at least 3 megatons of CO<sub>2</sub> is captured within industry per year by 2030;
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

**B.229** The **Heat and Buildings Strategy (2021)**<sup>200</sup> sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

**B.230** Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

**B.231** The **UK Hydrogen Strategy (2021)**<sup>201</sup>: sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030.

**B.232** The **Energy White Paper: Powering our net zero future (2020)**<sup>202</sup>: builds on the Prime Minister's Ten point plan for a green industrial revolution.

**B.233** The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

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<sup>200</sup> Department for Business, Energy & Industrial Strategy (2021). Heat and buildings strategy. (see <https://www.gov.uk/government/publications/heat-and-buildings-strategy>)

<sup>201</sup> Department for Business, Energy and Industrial Strategy (2021). UK Hydrogen Strategy. (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

<sup>202</sup> Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

**B.234** Key aims of the paper include:

- Supporting green jobs - The government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system - To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable - The government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 - The government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme - The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options - The government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind - The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments - Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy - The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points- The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills - The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers - The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition - The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

**B.235 Flood and Coastal Erosion Risk Management: Policy Statement (2020)**<sup>203</sup>: This policy statement sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure
- Managing the flow of water more effectively
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits

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<sup>203</sup> HM Government (2020). Flood and coastal erosion risk management: policy statement. (see <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>)

- Better preparing our communities

#### **B.236** Enabling more resilient places through a catchment-based approach

##### Sub-national

**B.237 Kent Environment Strategy (2016)**<sup>204</sup>: sets the following targets in relation to climate change mitigation and adaptation:

- Reduce emissions across the county by 34% by 2020 from a 2012 baseline (2.6% per year)
- More than 15% of energy generated in Kent will be from renewable sources by 2020 from a 2012 baseline
- Reduce the number of properties at risk from flooding

**B.238 River Stour Catchment Flood Management Plan (2009)**<sup>205</sup>: an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years. The District of Dover falls within five of the nine sub-areas outlined in the Plan but mostly within the 'Isle of Thanet and Rest of Catchment' sub-area. The following is relevant:

- Nailbourne and Little Stour: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.
- Lower Stour: Areas of low to moderate flood risk where action is being taken to store water and manage run-off in locations that provide overall flood risk reduction or environmental benefits.
- Sandwich Bay: Areas of low to moderate flood risk where flood risk is currently being managed effectively.
- Dour and Pent: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.
- Isle of Thanet and the rest of catchment: Areas of little or no flood risk.

**B.239 The British energy security strategy (2022)**<sup>206</sup> sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plan to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.

<sup>204</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>205</sup> Environment Agency (2009). River Stour Catchment Flood Management Plan. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/293884/Stour\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293884/Stour_Catchment_Flood_Management_Plan.pdf))

<sup>206</sup> Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022) British energy security strategy (see <https://www.gov.uk/government/publications/british-energy-security-strategy>)

- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

## Local

**B.240 Dover Surface Water Management Plan (2011)**<sup>207</sup>: identifies sustainable responses to manage surface water flooding and sets out an Action Plan for Dover to inform future decision making. These include the following:

- Improve property resistance/resilience for identified properties on Folkestone Road, East Street and Maison Dieu Road.
- Improve property resistance/resilience for additional selected properties on Folkestone Road and in Tower Hamlets (e.g. Tower Hamlets Street and De Burgh Street).
- Improve property resistance/resilience for selected properties on Crabble Avenue and along Coombe Valley Road.
- Improve property resistance for the properties adjacent to the NHS establishment on the south side of London Road by raising kerbs between the junctions of Kearsney Avenue and Alkham Road.
- Attenuate upstream flows in a detention basin in Buckland Valley Sports Ground. Route exceedance flows along Glenfield Road, Brookfield Avenue and Old Park Road. Raise pedestrian crossing at junction of Crabble Hill and Buckland Avenue to direct flow into the River Dour. Improve property resistance/resilience along route as required.
- Route exceedance flows from Frith Road into the River Dour adjacent to Morrison's supermarket, and route exceedance flows from Maison Dieu Road into (i) the River Dour via Crafford Street and (ii) a pond, wetland or underground storage sited in the existing Maison Dieu Road car park. Improve property resistance/resilience along route as required.
- Fit tide-excluding gates at outlet of Wellington Dock. Manage tide levels in the dock during periods of high river flow to maintain low tide levels and improve conveyance in the Dour Channel.
- Attenuate upstream flows in a detention basin, pond or wetland as part of redevelopment of Great Farthingloe. Route exceedance flows from Folkestone Road into a pond or wetland sited adjacent to the Government Immigration Buildings off St John's Road as part of any redevelopment.
- Route exceedance flows along Coombe Valley Road and Lorne Road and into the River Dour, with an off-line detention basin or pond at the Buckland Hospital site as part of site redevelopment. Improve property resistance/resilience along route as required.
- Improve property resistance/resilience for low threshold properties along High Street.
- Increase storage of flows in the River Dour in the existing ponds at Kearsney.
- Improve property resistance/resilience measures for selected properties in the valley between Cowper Road and Common Lane.
- Route exceedance flows down Minnis Lane and into the River Dour on the upstream side of Minnis Lane. Improve property resistance/resilience along route as required.

## Current baseline

### Climate change adaptation

**B.241** Changes to the climate will bring new challenges to the District's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP18) builds on the success of the UKCP09 which showed that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present<sup>208</sup>. The UKCP18 found that the largest warming in the UK will be in the South East where summer temperatures may increase another 3 to 4°C relative to present day, while median

<sup>207</sup> Jacobs (2011). Dover Surface Water Management Plan. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Surface-Water-Management-Plan.pdf>)

<sup>208</sup> UK Climate Projections (2018). Fact Sheet. (see <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-temperature.pdf>)



increases throughout the year are at least 1 to 2°C across the whole country. A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species.

### Flood risk

**B.242** Kent has the highest risk of local flooding of all local authorities in England and surface water flooding is estimated to affect 76,000 properties in Kent, of which approximately 60,000 are residential. Kent is also currently estimated to have approximately 64,000 properties at risk of river and coastal flooding, of which approximately 46,000 are residential<sup>209</sup>.

**B.243** Flood risk to the District is dominated by tidal flooding, although the settlements of Dover and Sandwich have the additional risk of fluvial flooding, from the River Dour and River Stour, respectively. In 2016, Sandwich Town had a tidal flood defence built which will protect the town from both fluvial and tidal flooding. In the lower lying areas of the District, groundwater is another primary source of flooding, as a result of the predominant chalk geology or where ground water springs have formed. High concentrations of springs can be found in and around the Dour Valley, as well as a band running from Deal, to Ash and up to Preston. Additionally, much of the coastal plain area is characterised by marshy areas made up of a series of drains, presenting a different type of flood risk<sup>210</sup>.

**B.244** The fluvial topography of the region is characterised by valleys which are typically 'u-shaped' with very flat bottoms and steep valley sides. This landscape character has an impact on flooding in the region as the extent is constrained by the steep valley sides, so once the valley bottom is inundated with water, any further increases in flooding generally leads to greater depths rather than an increase in the spatial extent<sup>211</sup>.

**B.245** There is demonstrable history of surface water and groundwater flooding across the urban area of Dover, for example in June 2007 and the winter of 2000/1.

**B.246** In addition to Dover's three main towns (Dover, Deal and Sandwich), the settlement of Whitfield also lies outside of the Flood Risk Zone. Figure B7 illustrates the location of flood risk zones in the District. The three main towns are most likely to experience sewer flooding, due to reliance on extensive sewer networks<sup>212</sup>.

### Tidal flooding

**B.247** The main sources of flooding in the Dover District are the sea and, to a lesser extent the River Dour through Dover and the River Stour through Sandwich. The Dover District coastline is particularly vulnerable to exceptional sea levels arising from a combination of high tides, storm surge, action of exceptional wave heights and the joint impacts of fluvial and tidal levels (particularly through Sandwich on the River Stour)<sup>213</sup>.

**B.248** The most severe flooding would be through either a breach in coastal defence structure or through the defence structure overtopping. The District has 33km of coastline, of which 26km benefits from formal sea defences. The area at greatest risk of flooding is north Deal, where the coastal defence structures are at greatest risk of breaching. In addition, the collection of spray-water from waves crashing against the coastal defences in Deal provides a flood risk in itself. The landscape slopes away from the coastline towards the centre of Deal and multiple roads adjacent to the coastline are orientated perpendicular to the shoreline. Flooding along watercourses in urban areas can, in some cases, be associated with the surcharge of subsurface drainage systems or the blockage of structures (e.g. culverts, outfalls or bridges)<sup>214</sup>.

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<sup>209</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>210</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>211</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>212</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>213</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

<sup>214</sup> Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

### Surface water flooding

**B.249** Surface water flooding in Dover could be caused by intense rainfall before it enters the River Dour or sewer network, overland flow resulting from high groundwater levels, exceedance of the capacity of the surface water or combined sewer networks and 'out of bank flow' from open-channel or culverted sections of the River Dour which results from runoff within the urban area<sup>215</sup>.

**B.250** There are some significant natural drainage paths entering the urban area from the surrounding chalk valleys. Although these are typically dry, they could become conduits for surface water flow during intense rainfall and/or when the surrounding chalk hills become saturated or frozen. A number of these flowpaths are down steep roads. The velocity of flow could present a significant hazard.

**B.251** The River Dour channel is complex with numerous culverted sections. It is severely constrained and includes potential obstructions to high flows. There are numerous surface water drains discharging into the River Dour which could become 'tide-locked' by high levels in the River Dour.

**B.252** Dover District, in partnership with the Environment Agency and Kent County Council have acted to improve Deal sea defences for 1,250 properties reducing the risk of coastal flooding from once in every 20 years to once in every 300 years. This has been achieved through installing a 200m rock revetment and splash wall at Sandown Castle<sup>216</sup>.

### Climate change mitigation

**B.253** The Government publishes data on the CO2 emissions per capita in each local authority that are deemed to be within the influence of local authorities. Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline (current progress is a 21% reduction since 2005). In the context of planned growth of Kent's population and housing development, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure Kent meets their targets and benefits from the opportunities for innovation in these sectors. Some 80% of the housing stock that will be used over the next few decades is already in place and so opportunities to retrofit energy technologies and support a change to low carbon lifestyles will be key to supporting residents in reducing costs and improving energy security<sup>217</sup>.

**B.254** The latest available data shows that CO2 emissions per capita in Dover fell by 28.9% over 2005-2013 although this masks widely different falls in the three broad sectors measures: Industry and Commercial -40.7%, Domestic -14% and Transport -11.8%.

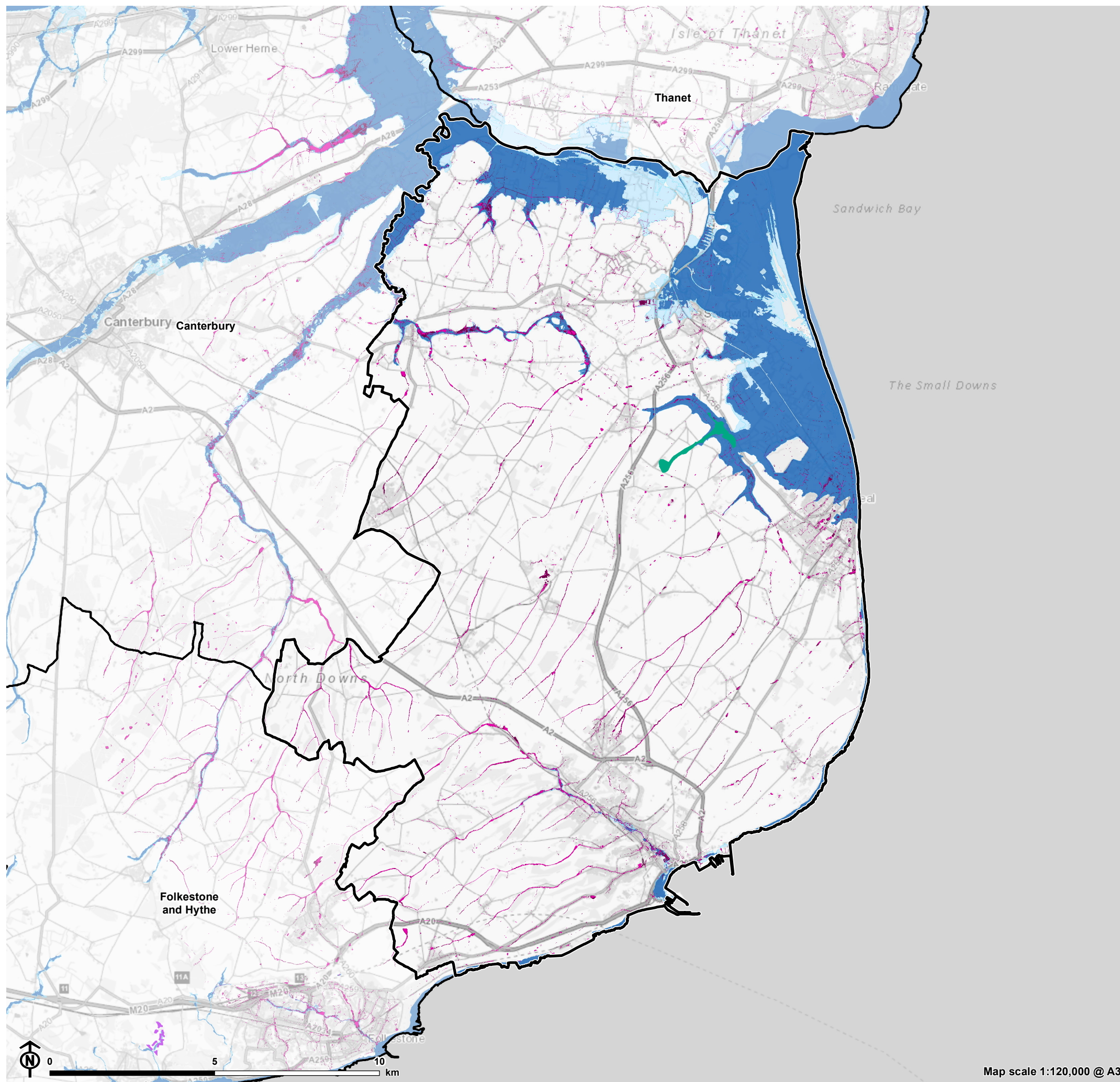
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<sup>215</sup> Herrington Consulting Ltd (2019). Site-specific Guidance for Managing Flood Risk. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Site-Specific-Guidance-for-Managing-Flood-Risk-March-2019.pdf>)

<sup>216</sup> Low Carbon Kent (2013). Climate Local Kent – One Year On: Progress Report 2013. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/10670/Climate-Local-Kent-Report-2013.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0014/10670/Climate-Local-Kent-Report-2013.pdf))

<sup>217</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

Figure B.7: Flood Risk



- Neighbouring district boundary
- District boundary
- Flood storage area
- Flood zone 2
- Flood zone 3
- Risk of flooding from surface water (1 in 30 years)
- Risk of flooding from surface water (1 in 100 years)
- Updown Reservoir

Map scale 1:120,000 @ A3

## Sustainability issues and likely evolution without the Local Plan

**B.255** Key sustainability issues facing the District are as follows:

- Hotter, drier summers expected under climate change have the potential for adverse effects on human health. A Local Plan offers another opportunity to update the District's approach to managing the effects of the changing climatic and associated weather events, particularly in the design of new buildings and green infrastructure (see SA objective 7).
- Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks can be managed effectively through the Local Plan and any associated update to the Council's Green Infrastructure Strategy (see SA objective 7).
- Flood risk to Dover District is dominated by tidal flooding, particularly to the north of Deal, where the coastal defence structures are at greatest risk of breaching. The expected magnitude and probability of significant fluvial, tidal ground and surface water flooding is increasing in the District due to climate change. The Local Plan offers an opportunity to contribute further to mitigate the potential effects of flooding by avoiding development in areas vulnerable to flood risk (see SA objective 7).
- The District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Furthermore, the location of new development within a sustainable pattern of development is also key to addressing the climate change challenge (see SA objective 8).

## SA objectives

**Table B.6: Climate change and flood risk SA objectives and appraisal questions**

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change.	SA7.1: Does the Plan avoid placing people and property in areas of flood risk, or where it exceptionally does, is it safe without increasing flood risk elsewhere, taking into account the impact of climate change? SA7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure?	Water Soil Climatic Factors Human Health
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	SA8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat? SA8.2: Does the Plan promote and facilitate the use of electric cars, sustainable patterns of development and sustainable modes of transport.	Water Soil Climatic Factors Human Health

## Biodiversity

### Policy context

#### International

**B.256 International Convention on Wetlands (Ramsar Convention) (1976):** international agreement with the aim of conserving and managing the use of wetlands and their resources.

**B.257 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979):** aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

**B.258 International Convention on Biological Diversity (1992):** international commitment to biodiversity conservation through national strategies and action plans.

**B.259 United Nations Declaration on Forests (New York Declaration) (2014):** international commitment to cut natural forest loss by 2020 and end loss by 2030.

**B.260 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)<sup>218</sup>:** international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

#### National

**B.261 National Planning Policy Framework (NPPF) (2021)<sup>219</sup>:** encourages plans to “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.

**B.262** The NPPF states that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is also to be supported through planning policies and that there should also be support for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

**B.263 National Planning Practice Guidance (NPPG) (2021)<sup>220</sup>:** supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

**B.264 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019<sup>221</sup>** protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

**B.265 Natural Environment and Rural Communities Act 2006<sup>222</sup>:** places a duty on public bodies to conserve biodiversity.

**B.266 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (2011)<sup>223</sup>:** guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological

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<sup>218</sup> COP26 (2021). United Nations Declaration on Forests and Land Use.

<sup>219</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>220</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>221</sup> HM Government (2019). The Conservation of Habitats and Species Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules>)

<sup>222</sup> HM Government (2006). Natural Environment and Rural Communities Act 2006. (see [http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga\\_20060016\\_en.pdf](http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf))

<sup>223</sup> Department for Environment, Food and Rural Affairs (2011). Biodiversity 2020: A strategy for England’s wildlife and ecosystem services. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf))

networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

**B.267 England Biodiversity Strategy Climate Change Adaptation Principles (2008)**<sup>224</sup>: sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpins all of these.

**B.268 Biodiversity offsetting in England Green Paper (2013)**<sup>225</sup>: biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

**B.269 A Green Future: Our 25 Year Plan to Improve the Environment (2018)**<sup>226</sup>: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
  - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
  - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
- Support and protect international forests and sustainable agriculture.

**B.270 The Environment Act 2021**<sup>227</sup> is a key vehicle for delivering the bold vision set out in the 25 Year Environment Plan. An important aspect of the Environment Bill is the power to set long-term, legally-binding environmental targets. Setting targets will provide a strong mechanism to deliver long-term environmental outcomes. It requires government to set at least one target in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction, as well as a target for fine particulate matter (PM2.5). To ensure the delivery of Biodiversity Net Gain (BNG), the Environment Act 2021 introduced a requirement that all applications for the development of land will have to deliver a 10% biodiversity net gain above the ecological baseline for the application site. The Act also introduces Local Nature Recovery Strategies which will guide the delivery of biodiversity net gain projects. The spatial extent of these Strategies is to be determined by the Secretary of State. The implementation of these new initiatives will ensure that new development contributes towards the delivery of net gains in biodiversity, so that the environment, across the district as a whole, is improved by the end of the plan period. The requirements of the Environment Act will come into force in 2023 following a two-year transition period to enable local planning authorities, developers and others to prepare for the proposed requirement.

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<sup>224</sup> Department for Environment, Food and Rural Affairs (2008). The England Biodiversity Strategy Climate Change Adaptation Principles. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69270/pb13168-eps-ccap-081203.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-eps-ccap-081203.pdf))

<sup>225</sup> Department for Environment, Food and Rural Affairs (2013). Biodiversity offsetting in England Green Paper. (see [https://consult.defra.gov.uk/biodiversity/biodiversity\\_offsetting/supporting\\_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf](https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf))

<sup>226</sup> HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf))

<sup>227</sup> GM Government (2021). The Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

## Sub-national

**B.271 South East Marine Plan (2021)**<sup>228</sup>: the South East Marine Plan stretches from Felixstowe in Suffolk to near Folkestone in Kent, covering approximately 1,400km of coastline, taking in a total of approximately 3,900km<sup>2</sup> of sea. The Plan provides a policy framework that will be used to help inform decision-making on what activities take place in the marine environment and how the marine environment is developed, protected and improved in the next 20 years. The Plan will help businesses realise the economic benefits available from the marine plan area whilst ensuring the marine environment remains protected. This will be achieved through its thirteen objectives, the use of natural capital and supporting local policies – all of which have been developed in partnership with local and national organisations, representatives and users of the area.

**B.272 Kent Environment Strategy (2016)**<sup>229</sup> sets the following targets in relation to biodiversity:

- A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable recovery by 2020.
- 60% of local wildlife sites will be in positive management and 95% of.
- SSSIs will be in favourable or recovering status by 2020.
- Status of bird and butterfly species in Kent and Medway are quantified.
- Complete a natural capital assessment for Kent by 2017.

**B.273** These targets are supported through the **Kent Environment Policy (2020)**<sup>230</sup>, which is monitored through the Council's environmental management system.

**B.274 Kent Net Zero Action Plan (n.d.)**<sup>231</sup> outlines the different ways in which Kent County Council will achieve net zero by 2030, some of which include developing, testing and implementing an Environment and Climate Change Impacts Assessment, developing minimum design standards for new build projects, reducing business miles and encouraging the use of electric vehicles, e.g. through an electric only car scheme. The Council will embed net zero targets within appropriate procurement contracts and improve active travel facilities, whilst also rolling out LED lighting in KCC buildings where practicable.

**B.275 Kent Biodiversity Action Plan (2011)**<sup>232</sup>: 28 Kent Habitat Action Plans. Each Plan denotes the importance of conserving, enhancing and restoring the natural condition of a habitat by working together on projects.

**B.276 Kent Nature Partnership Biodiversity Strategy 2020 to 2045 (2020)**<sup>233</sup>: sets out the contribution the county of Kent and the partnership can make to the Government's ambition to leave our environment in a better state than we found it and its aspirations set out in the 25 Year Environment Plan.

**B.277 A Living Landscape for the South East (2006)**<sup>234</sup>: sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The documents highlights the following issues:

- There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide ('ecosystem services'). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.
- Better access to the natural environment helps improve mental and physical health, and improves quality of life. There is a need to bring wild places to more people, and bring more people into wild places.

<sup>228</sup> Marine Management Organisation (2021). South East Marine Plan. (see <https://www.gov.uk/government/collections/south-east-marine-plan>)

<sup>229</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>230</sup> Kent County Council (2020). Environment Policy. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0004/10669/KCC-Environmental-Policy.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0004/10669/KCC-Environmental-Policy.pdf))

<sup>231</sup> Kent County Council (n.d.). Net Zero Plan. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0017/122291/KCC-Net-Zero-action-Plan.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0017/122291/KCC-Net-Zero-action-Plan.pdf))

<sup>232</sup> Kent BAP (2011). Kent Biodiversity Action Plan. (see <http://www.kentbap.org.uk/>)

<sup>233</sup> Kent Nature Partnership (2020). Biodiversity Strategy 2020 to 2045. (see <https://kentnature.org.uk/wp-content/uploads/2022/01/Kent-Biodiversity-Strategy-2020.pdf>)

<sup>234</sup> The South East Wildlife Trusts (2006). A Living Landscape for the South East. (see [http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A\\_Living\\_Landscape\\_for\\_the\\_South\\_East.pdf](http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf))

- Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.
- Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

**B.278 Green Infrastructure Strategy (2014)**<sup>235</sup>: the District Green Infrastructure (GI) Strategy sets out a framework for protecting, managing, enhancing and increasing the District's GI and for ensuring that the quality of provision is maintained and enhanced in light of the significant housing growth forecast for the District. The GI Strategy concludes that the importance of Kearsney Abbey, Russell Gardens and Bushy Ruff remains an outstanding priority, particularly given its appeal to a wider public. Satisfaction levels with both the number and quality of GI spaces across the District are high. Deal beach and Kearsney Abbey are the most popular locations, followed by St Margaret's and the White Cliffs. The results indicate that residents primarily use GI assets close to their homes rather than travel across the District. The District is in the process of updating its Green Infrastructure Strategy to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.

**B.279 Securing the value of nature in Kent (2011)**<sup>236</sup>: explains the benefits of harnessing the value of nature to support business and economy, public health and productive and environmental management.

**B.280 An East Kent Approach to Green Infrastructure and Recreation (2014)**<sup>237</sup>: sets out to inform a future co-operative working by the Local Planning Authorities, both as part of the East Kent Green Infrastructure Partnership (EKGIP) and as a working group of planning authorities. It intends to provide background information to help guide the future direction of EKGIP.

**B.281 Kent's Plan Bee Pollinator Action Plan (2019)**<sup>238</sup>: is a pollinator action plan which seeks to encourage local communities to improve the food sources and general habitat for pollinators in Kent. The purpose of the plan is to:

- Make the council a community leader in action for pollinators;
- Ensure that pollinators' needs are always considered throughout our work and services;
- Put the conservation of pollinators and their habitats at the heart of land management and planning; and
- Make the council a significant contributor to the recovery of pollinator populations.

**B.282 Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM) (2021)**<sup>239</sup>: provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) arising from the Dover District Local Plan. Specifically, preventing an increase in bird disturbance from recreational activity arising through increases in houses. The document proposes a SAMM officer role to deliver the strategy and to carry out engagement with visitors, landowners and the wider community, a new partnership of landowners in the Bay, on-site signage, online and information campaigns, and monitoring of birds and visitors.

## Current baseline

### Biodiversity

**B.283** Kent did not meet its Biodiversity 2010 targets and with biodiversity continuing to decline, it is likely that Kent will also fail to meet the 2020 targets. Although there have been real gains for wildlife in some areas, there is still a gradual loss of habitats and species in the county, for example of the Local Wildlife Sites monitored over the past five years, 30% have been damaged

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<sup>235</sup> Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

<sup>236</sup> Pape, D and Johnston, J (2011). Securing the value of nature in Kent. (see [http://www.kentbap.org.uk/images/uploads/Securing\\_the\\_Value\\_of\\_Nature\\_in\\_Kent.pdf](http://www.kentbap.org.uk/images/uploads/Securing_the_Value_of_Nature_in_Kent.pdf))

<sup>237</sup> Val Hyland Consulting and Blackwood Bayne Consulting (2014). An East Kent Approach to Green Infrastructure and Recreation. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/An-East-Kent-Approach-to-Green-Infrastructure-and-Recreation-Report-April-2014.pdf>)

<sup>238</sup> Kent County Council (2019). Kent's Plan Bee: Kent County Council's Pollinator Action Plan. (see <https://www.kent.gov.uk/environment-waste-and-planning/nature-and-biodiversity/pollinators/kents-plan-bee-pollinator-action-plan>)

<sup>239</sup> Dover District Council (2021). Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM). Unpublished.



and 2% lost. This represents a significant threat to the intrinsic value of Kent's natural environment and to the economic and social benefit that it provides<sup>240</sup>.

**B.284** Associated with the landscape of the District are some important wildlife sites – three terrestrial Special Areas of Conservation (SAC), one Special Protection Area (SPA) and Ramsar site, two National Nature Reserves (NNR) and over fifty Sites of Nature Conservation Interest (SNCI). Two of the three SACs (Sandwich Bay and Dover to Kingsdown Cliffs) are located along the coast, while the other (Lydden & Temple Ewell Downs) is located in the south west of the District.

**B.285** The Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC Visitor Surveys<sup>241</sup> were conducted to determine the area from which visitors to the SACs originate. Managing visitor access and numbers is vital to preventing an adverse impact on the integrity of the fragile chalk grassland ecosystems of these landscapes. The study found that both sites are very different in terms of visitation, specifically the origin of visitors, group composition, activity and frequency of visits. According to the study, most visitors travelling from home originate from Dover District. Most of the visitors to Lydden Temple Ewell SAC travel from home for their visit (96%), on foot (74%) and for daily exercise or dog walking purposes. The profile of visitors to Dover to Kingsdown Cliffs SAC was markedly different. Nearly half of the visitors to Dover to Kingsdown Cliffs SAC were on holiday, 42% were first time visitors, and 32% traveled to the cliffs by foot. The majority of people at Lydden Temple Ewell (80%) stated they visit regularly throughout the year, with 74% visiting at least once a week compared to just 9% at Dover to Kingsdown. However, the length of stay was greater at Dover to Kingsdown, with 53% of people staying more than 2 hours, compared to 14% at Lydden Temple Ewell.

**B.286** Dog walking was the main activity at Lydden Temple Ewell (78% of visitors) compared to 14% dog walkers at Dover to Kingsdown. The proportion of dogs off the lead was much higher at Lydden Temple Ewell (83%) compared to Dover to Kingsdown (16%). In terms of biodiversity, 65% of visitors to Lydden Temple Ewell saw information on site boards, compared to 44% at Dover to Kingsdown.

**B.287** An ongoing visitor disturbance study<sup>242</sup> at the SPA and Ramsar site (Thanet Coast & Sandwich Bay) shows that recreational impacts are having an adverse impact on the species for which the SPA/Ramsar has been designated. The major concern is that of disturbance to over-wintering birds, particularly their ability to feed and, consequently, resulting adverse effects on their breeding performance. The Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy<sup>243</sup> states that whilst development in Dover is unlikely to have a significant impact on Pegwell Bay it may impact Sandwich Bay, and highlights that recreational activity, particularly dog walking, causes harmful disturbance to such bird species. The strategy notes that recreational activity is very likely to increase as a result of the increase in housing numbers that the Local Plan will deliver. In response to this, financial contributions will be sought for new residential development coming forward within the 9km Zone of Influence.

**B.288** The Stodmarsh SPA, RAMSAR and SAC complex is located close to the north western edge of the District in neighbouring Canterbury. Stodmarsh is sensitive to increases in phosphorus and nitrogen reducing water quality. Developments in the immediate vicinity of the marsh are being sought to achieve nutrient neutrality. The Stodmarsh Water Quality Modelling<sup>244</sup> study seeks to determine if there is potential for hydraulic connection enabling water discharged from Dambridge WwTW (which includes nitrogen and phosphorus nutrients) to reach Stodmarsh and enter the freshwater lakes, and potentially effect biodiversity in these areas. The study found that whilst there is potential for connection between Dambridge WwTW and Stodmarsh under extreme conditions, it is generally limited to intermittent periods of high tidal range and low river flow when the propagation of tide upstream is greatest. However, the study highlighted that when connectivity does occur, dilution would be so great, that any nutrients released from the WwTW would be undetectable, and therefore are unlikely to affect local biodiversity.

**B.289** The findings of the HRA will be taken into account in the SA where relevant.

**B.290** There are five SSSIs in the District:

- Alkham, Lydden and Swingfield Woods (76.56% favourable condition).

<sup>240</sup> Kent County Council (2016). Kent Environment Strategy. (see [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

<sup>241</sup> Blackwood Bayne (2021). Visitor Surveys Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC July-August 2021. Unpublished.

<sup>242</sup> Strategic Marketing (2012). Dover Visitor Survey: Pegwell Bay and Sandwich Bay. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Visitor-Survey-Pegwell-Bay-and-Sandwich-Bay-2012.pdf>)

<sup>243</sup> Dover District Council (2021). Thanet Coast and Sandwich Bay SPA Mitigation Strategy. Unpublished

<sup>244</sup> APEM Ltd (2021). Stodmarsh Water Quality Modelling Dover District County Council. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/P6031-River-Stour-Connectivity-Study-Nov2021.pdf>)

- Dover to Kingsdown Cliffs (61.34% favourable condition).
- Folkestone Warren (60.55% favourable condition).
- Lydden and Temple Ewell Downs (86.10% favourable condition).
- Sandwich Bay to Hacklinge Marshes (50.35% favourable condition).

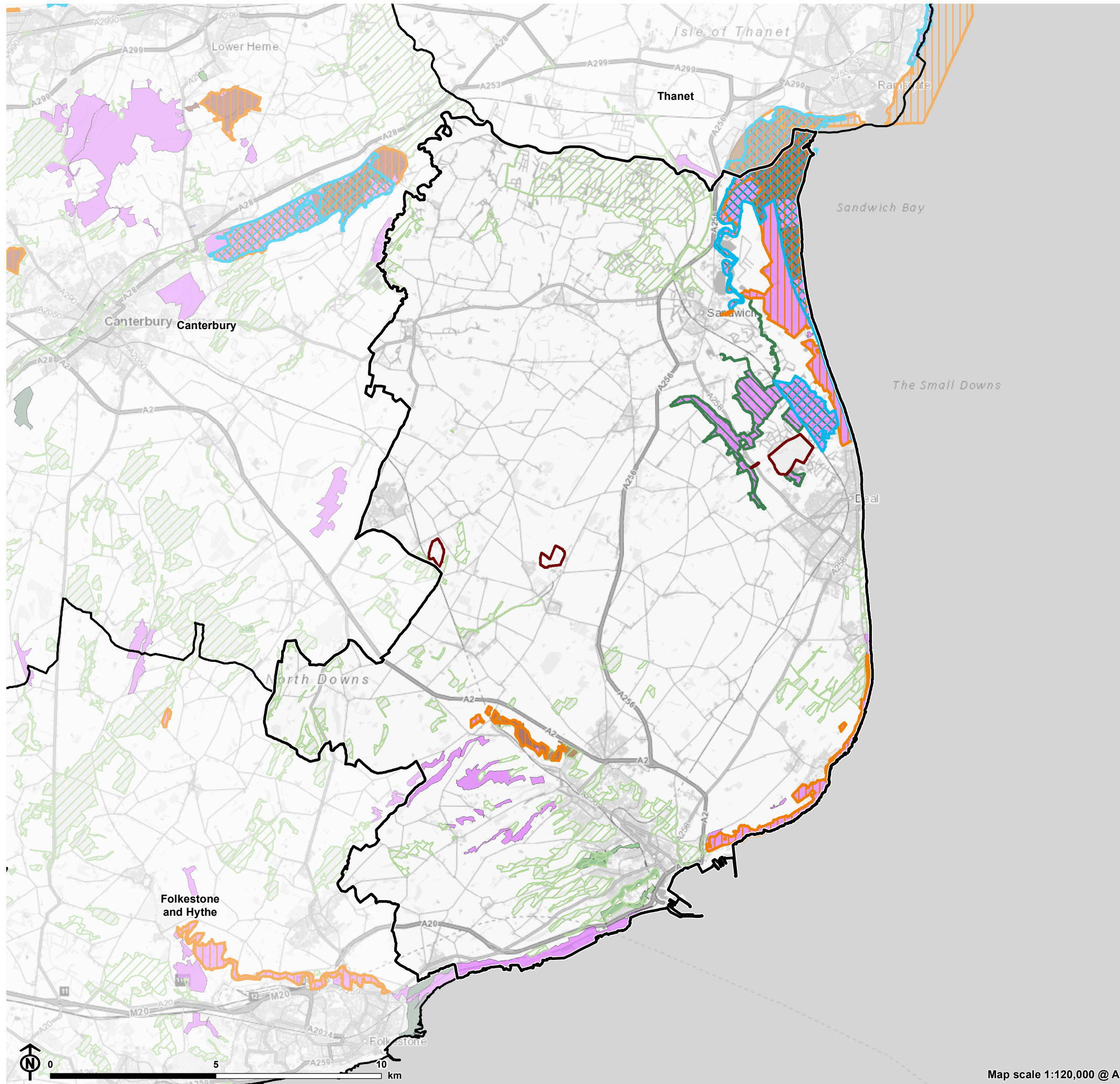
**B.291** The District contains a significant number of BAP Priority Habitats. Pockets of deciduous woodland are scattered throughout the District, in discreet pockets and along field boundaries. The District contains less extensive distributions of good quality, semi-improved grasslands, which are largely concentrated in the southern quarter of the District. Coastal sand dunes, lowland fens and coastal and floodplain grazing marshes are located along Sandwich Bay and within Worth. Ancient woodland can be found on the chalk around Alkham, Swingfield and Lydden (near Dover), which have been designated as SSSIs for wildlife such as lady orchid, green hellebore and the dormouse. Figure B8 illustrates the biodiversity and geodiversity designations across the District.

### Geodiversity

**B.292** Three Regionally Important Geological Sites are located in the District:

- **Betteshanger Colliery Tip:** This RIGS is at the former Betteshanger Colliery, which was one of the largest collieries in Kent. The colliery opened in 1924-30 and closed in 1989. The tip, located to the north east of the former pit, was composed of carboniferous sedimentary rock. The fossil plant assemblages found indicate areas of forest, river levees and overbank (crevasse) deposition. A rare, large millipede-like arthropod fossil was also found. The tip has now been landscaped to create Fowlmead Country Park, now known as the Betteshanger Sustainable Parks.
- **Tilmanstone Colliery Tip:** The spoil tip of a colliery that opened in 1906-1913. The tip is composed of carboniferous sedimentary rock. The recording of the rocks and fossils in the spoil heap, now an endangered system in Kent, is important in our understanding of changes in climate and habitat. Fossil plants found at the colliery include clubmosses, horsetails, ferns and gymnosperms.
- **Snowdown Colliery Tip:** The spoil tip of a colliery that opened in 1909 and closed in 1987. The tip is composed of carboniferous sedimentary rock. A central depression was caused by extraction for construction of the Channel Tunnel. Fossil plants found at the site include arboreal clubmosses, horsetails, ferns, rare cordaites and charcoal. Fossil animals found include arthropods both terrestrial and freshwater.

Figure B.8: Biodiversity and Geodiversity Designations



- District boundary
- Neighbouring district boundary
- Special Protection Area
- Special Area of Conservation
- Ramsar
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- Regionally Important Geological Site



Map scale 1:120,000 @ A3

## Sustainability issues and likely evolution without the Local Plan

**B.293** Key sustainability issues facing Dover District are as follows:

- Dover contains a number of designated biodiversity sites. All of these biodiversity assets, most notably the Thanet Coast & Sandwich Bay SPA and Ramsar Site, could be harmed by inappropriate development. The Local Plan provides an opportunity to evaluate the condition of the District's habitats and employ measures to ensure that future growth in the District does not adversely affect their current condition but where possible contributes to their improvement and connection (see SA objective 9).
- Green networks for wildlife and natural green spaces need to be set out clearly in the District Local Plan and any associated GI Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate (see SA objective 9).

## SA objectives

**Table B.7: Biodiversity SA objectives and appraisal questions**

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	<p>SA9.1: Does the Plan avoid and mitigate adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?</p> <p>SA9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</p> <p>SA9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?</p> <p>SA9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?</p>	<p>Biodiversity</p> <p>Flora and Fauna</p> <p>Landscape</p>

## Historic environment

### Policy context

#### International

**B.294 United Nations (UNESCO) World Heritage Convention (1972):** promotes cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

**B.295 European Convention for the Protection of the Architectural Heritage of Europe (1985):** defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

**B.296 Valletta Treaty (1992)** formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)<sup>245</sup>: aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

#### National

**B.297 National Planning Policy Framework (NPPF) (2021)<sup>246</sup>:** plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a. the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c. the desirability of new development making a positive contribution to local character and distinctiveness; and
- d. opportunities to draw on the contribution made by the historic environment to the character of a place."

**B.298 National Planning Practice Guidance (NPPG) (2021)<sup>247</sup>:** supports the NPPF by requiring that Local plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

**B.299 Ancient Monuments & Archaeological Areas Act 1979<sup>248</sup>:** a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**B.300 Planning (Listed Buildings & Conservation Areas) Act 1990<sup>249</sup>:** an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

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<sup>245</sup> Council of Europe (1992). Valletta Treaty. (see <https://rm.coe.int/168007bd25>)

<sup>246</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>247</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>248</sup> HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>)

<sup>249</sup> HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see [http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\\_19900009\\_en.pdf](http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf))

**B.301 Historic Buildings and Ancient Monuments Act 1953<sup>250</sup>**: an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

**B.302 The Government's Statement on the Historic Environment for England (2010)<sup>251</sup>**: sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

**B.303 The Heritage Statement (2017)<sup>252</sup>**: sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**B.304 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016)<sup>253</sup>**: sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

**B.305 The Environment Act 2021<sup>254</sup>** sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of "*archaeological, architectural artistic, cultural or historic interest*".

### Sub-national

**B.306 The Kent Design Guide (2008)<sup>255</sup>**: seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others achieve high standards of design and construction by promoting a common approach to the main principles which underlie Local Planning Authorities' criteria for assessing planning applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations. The guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

**B.307 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)<sup>256</sup>**: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030, development that is needed to support economic and community progress will be designed to best reflect the character, function and scale of its surroundings. The location of significant new developments will be considered across existing local authority boundaries, to ensure that local distinctiveness is properly reflected and needless environmental cost avoided.

**B.308 The Kent Environment Strategy (2016)<sup>257</sup>**: seeks to provide support to decision makers in ensuring that the county of Kent remains the highly desirable location of choice for visitors, residents and businesses. Delivery of the strategy will support a competitive and resilient economy, with business innovation in low carbon and environmental services driving economic growth.

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<sup>250</sup> HM Government (1953). Historic Buildings and Ancient Monuments Act 1953. (see <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>)

<sup>251</sup> HM Government (2010). The Government's Statement on the Historic Environment for England 2010. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>)

<sup>252</sup> Department for Digital, Culture Media and Sport (2017). Heritage Statement 2017. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664657/Heritage\\_Statement\\_2017\\_final\\_-\\_web\\_version\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf))

<sup>253</sup> Historic England (2016). Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8. (see <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>)

<sup>254</sup> HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>255</sup> Kent Design Initiative (2008). The Kent Design Guide. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/12092/design-guide-foreword.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/12092/design-guide-foreword.pdf))

<sup>256</sup> East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85.pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85.pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

<sup>257</sup> Kent County Council (2016). Kent Environment Strategy. (see [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf))

Residents will have a high quality of life, saving money in warmer, healthier homes and benefitting from the many services provided through natural and historic assets both within their communities and across the county.

### Local

**B.309 Dover District Heritage Strategy (2013)<sup>258</sup>**: seeks to ensure that the heritage of the Dover District plays a clear role in shaping any future regeneration, development and management decisions. It is intended that the Strategy provides a strategic and clear approach to dealing with Dover's heritage and that the document might act as a pilot exemplar for similar schemes elsewhere in the country. The Strategy identifies the following issues that the District's heritage assets are vulnerable to:

**B.310** Natural processes such as coastal erosion, sea level change, change in hydrology and climate change;

- Rural activities such as ploughing and use of machinery, changes in farming regime and leisure use of the countryside;
- The development and maintenance of infrastructure such as utilities, power generation, roads and railways;
- Development of sites including house building, commercial and industrial properties, extraction of minerals, change in landuse, flood and coastal defence works;
- Change through alteration or economic decline and neglect;
- Policy shortcomings, designation thresholds and capacity for monitoring and enforcement;
- Criminal actions such as arson, theft, vandalism and anti-social behaviour.
- To take the strategy forward four broad objectives have been identified:
- Dover District's historic environment and its heritage assets play a proactive role in enabling and informing regeneration activities to secure better outcomes from sustainable growth.
- Dover District realises the tourism and visitor potential and economic benefits of its historic environment and heritage assets.
- Dover District's heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance.
- Public understanding of, engagement with, access to and enjoyment of Dover District's historic environment are increased.

### Current baseline

**B.311** The District's heritage assets play an important role in defining the character of the District and the identity of its settlements. In many cases they reflect the District's strategic coastal location and particularly in Dover's case, its military importance as the closest crossing point to continental Europe. This has given rise to a series of fortifications, most notably the Roman Classis Britannica, Dover Castle, Fort Burgoyne, the Western Heights and First and Second World War fortifications. Although Dover Castle is the District's top attraction, collectively these assets are not used in a way that exploits their full potential.

**B.312** The Dover District has a rich heritage with 1,926 Listed Buildings (including 38 Grade I and 110 Grade II\*), 50 Scheduled Monuments, 57 Conservation Areas and six Registered Parks and Gardens. One protected Wreck Site is located off the coast of Dover District. Two Heritage Coasts in Kent are found either side of the town of Dover. In addition, there are 21 locally-listed historic parks and gardens.

**B.313** There are 10,650 non-designated heritage assets, including 772 standing buildings, 9845 below-ground archaeology features and findspots and 33 maritime features (principally shipwrecks). Some of these are of similar significance to the designated assets, produce most of the District's historic character and include many of the assets most valued by local

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<sup>258</sup> Dover District Council (2013). Dover District Heritage Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Heritage-Strategy-Main-Document.pdf>)

people<sup>259</sup>. Further information on the non-designated (and designated) heritage assets in Dover can be found on Kent County Council's Historic Environment Record.

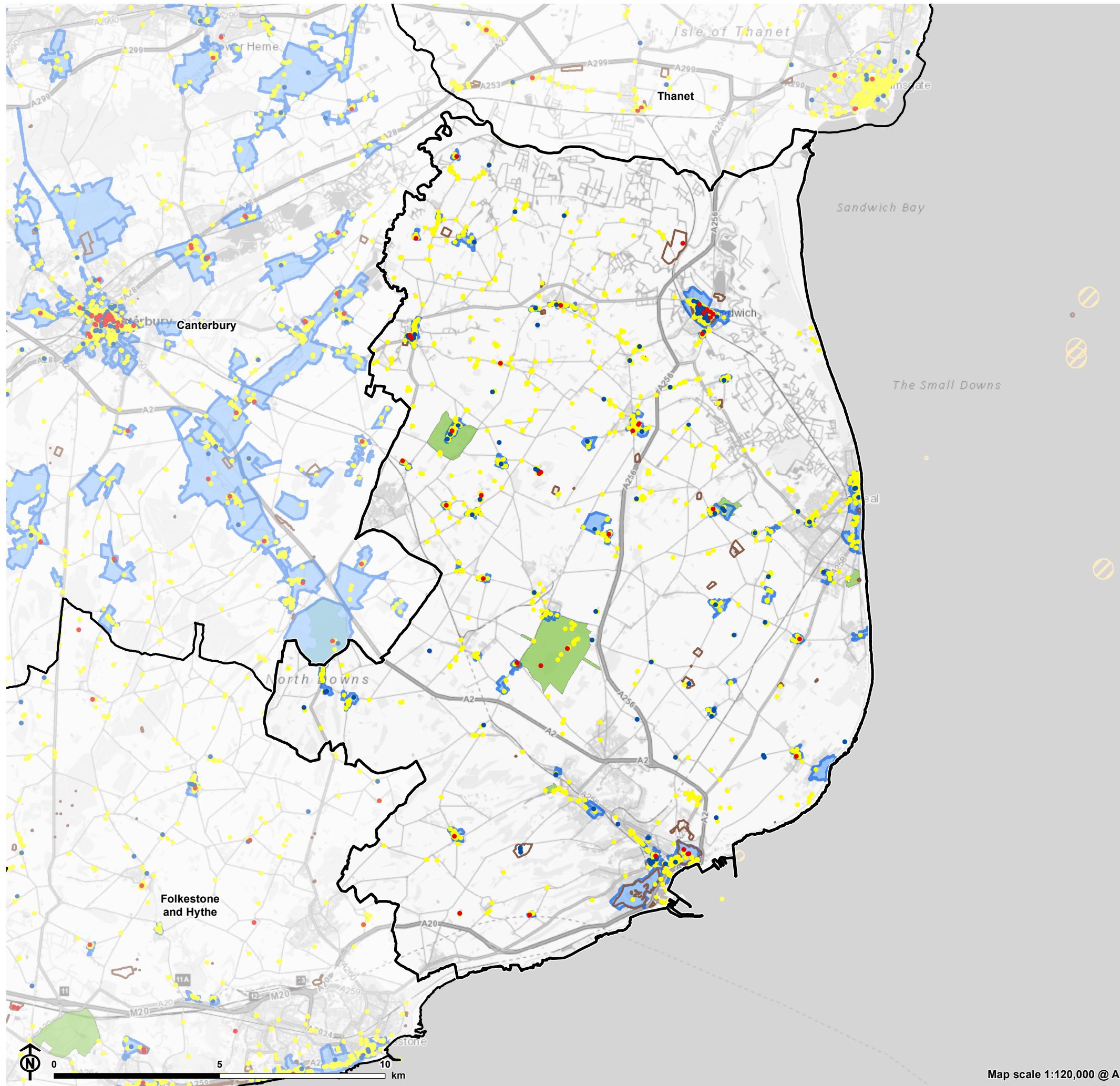
**B.314** The Historic England at Risk Register lists 13 assets at risk, five of which are in 'Very bad' condition (London Road, Mongeham Road, Western Heights, St Radegunds Abbey and The Belvedere in Waldershare Park) and three of which display 'Extensive significant problems' (ring ditch and enclosure 200yds east of Parsonage Farm, Great Mongeham Anglo-Saxon cemetery and four ring ditches on ridge of Sutton Hill). The Church of St Martin in Great Mongha, St Mary in Wingham and the ruins of St James' Church in Dover are in poor condition. Fort Burgoyne is also on the register, but is in fair condition. Figure B9 illustrates the designated heritage assets across the District.

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<sup>259</sup> Dover District Council (2020). Dover District Heritage Strategy 2020. (see <https://www.dover.gov.uk/Planning/Regeneration/PDF/Heritage-Strategy-main-doc-web-PDF.pdf>)



Figure B.9: Historic Environment



- District boundary
- Neighbouring district boundary
- World Heritage Site
- Scheduled monument
- Conservation area
- Registered Park and Garden
- Protected wreck
- Listed building**
  - Grade I
  - Grade II\*
  - Grade II

Map scale 1:120,000 @ A3

## Sustainability issues and likely evolution without the Local Plan

**B.315** Key sustainability issues facing Dover are as follows:

- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve accessibility and interpretation of it (see SA objective 10).

## SA objectives

**Table B.8: Historic environment SA objectives and appraisal questions**

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	<p>SA10.1: Does the Plan avoid adverse effects on the District's designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly at risk assets?</p> <p>SA10.3: Does the Plan promote access to as well as enjoyment and understanding of the local historic environment for the District's residents and visitors?</p>	Cultural Heritage

## Landscape

### Policy context

#### International

**B.316 European Landscape Convention (2002)**<sup>260</sup>: promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

#### National

**B.317 National Planning Policy Framework (NPPF) (2021)**<sup>261</sup>: planning principles include:

- Recognising the intrinsic beauty and character of the countryside.
- Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
- Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.

**B.318 National Planning Practice Guidance (PPG) (2021)**<sup>262</sup>: updated in 2019 to provide information on how development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty should be dealt with. According to the guidance, land within the setting of these areas often makes an important contribution to maintaining their natural beauty. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

**B.319 A Green Future: Our 25 Year Plan to Improve the Environment (2018)**<sup>263</sup>: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

**B.320 National Parks and Access to the Countryside Act 1949 (1949)**<sup>264</sup>: an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

**B.321 Countryside and Rights of Way Act 2010**<sup>265</sup>: an Act of Parliament to make new provision for public access to the countryside.

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<sup>260</sup> Council of Europe Landscape Convention (2000). The European Landscape Convention. (see <https://www.coe.int/en/web/landscape/the-european-landscape-convention>)

<sup>261</sup> Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf))

<sup>262</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

<sup>263</sup> HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf))

<sup>264</sup> HM Government (1949). National Parks and Access to the Countryside Act 1949. (see <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>)

<sup>265</sup> HM Government (2010). Countryside and Rights of Way Act 2010. (see <https://www.legislation.gov.uk/ukpga/2000/37/section/85>)

**B.322 England National Parks and the Broads: UK Government Vision and Circular (2010)**<sup>266</sup>: provides updated policy guidance on the English National Parks and Broads. It also sets out a vision for 2030 and the key outcomes the Government is seeking over the next five years to ensure early progress towards the vision.

**B.323** The key area in the **25 Year Environment Plan (2018)**<sup>267</sup> of relevance in terms of the conservation and enhancement of landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

**B.324 National Design Guide (2021)**<sup>268</sup>: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**B.325 National Model Design Code (2021)**<sup>269</sup>: provides detailed guidance on the production of design codes, guides and policies for local authorities and communities, to promote successful design that is good quality. The National Model Design Code forms part of the government's Planning Practice Guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

**B.326 The Environment Act 2021**<sup>270</sup> sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its 'archaeological, architectural, artistic, cultural or historic interest.'

### Sub-national

**B.327 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2021-2026 (2014)**<sup>271</sup>: sets out the shared vision of the future of the AONB. The Plan identifies key issues, opportunities and threats facing the landscape and sets out aims and principles for the positive conservation and enhancement of the Kent Downs for a five-year period. The goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened well into the future.

**B.328 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)**<sup>272</sup>: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030, East Kent's many designated areas of particular landscape interest will be managed more collaboratively, stressing their interdependence and strengthening their capacity to withstand development pressures.

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<sup>266</sup> Department for Environment, Food and Rural Affairs (2010). English National Parks and the Broads: UK Government Vision and Circular 2010. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf))

<sup>267</sup> Defra (2021). A Green Future: Our 25 Year Plan to Improve the Environment. (see <https://www.gov.uk/government/publications/25-year-environment-plan>)

<sup>268</sup> Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

<sup>269</sup> Ministry of Housing, Communities and Local Government (2021). National Model Design Code. (see <https://www.gov.uk/government/publications/national-model-design-code>)

<sup>270</sup> HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

<sup>271</sup> Kent Downs AONB Unit (2014). Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019. (see [http://www.kentdowns.org.uk/uploads/documents/1\\_The\\_Kent\\_Downs\\_AONB.pdf](http://www.kentdowns.org.uk/uploads/documents/1_The_Kent_Downs_AONB.pdf))

<sup>272</sup> East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

## Current baseline

### Geology and soils

**B.329** Dover District extends from the flat alluvial coastal marshes in the north and north east rising gradually across a band of mixed geology and fertile loamy soils to the undulating chalk landscapes and lime-rich soils that characterise much of the District. The valleys and ridges become more pronounced further south before rising sharply to the shallow soils of the rolling chalk downs in the south of the District, mostly within the Kent Downs AONB.

### Landform and drainage

**B.330** The landform of Dover District rises gradually from north to south and is drained by two main rivers, the River Stour in the north and the River Dour in the south.

**B.331** The flat open landform on the northern periphery of the District is associated with the alluvial marshes of the Ash Levels, the Lower Stour Valley and Hacklinge Marshes of the Lydden Valley. The marshland and wetlands of this part of the North Kent Plain have an intricate pattern of drainage ditches and dykes which drain into the River Stour.

**B.332** The low-lying shingle beaches along the coast are backed by sand dunes but rise to chalk cliffs to the south of Deal.

**B.333** West of Sandwich the landform is characterised by the flat to gently undulating landscapes of the fertile horticultural belt.

**B.334** As chalk begins to dominate the bedrock in the centre and south of the District, the topography is characterised by a regular pattern of rolling ridges and valleys running in a north west direction, which gets more defined towards to the south.

**B.335** To the south of the District, along the boundary with the Kent Downs AONB, the landform rises sharply along the edge of the escarpment slope of the North Downs, at Lydden Hills and Guston Hills. The dry chalk valleys in this area are drained by the River Dour which runs to the coast through Dover. The town grew up around the river and it was a source of power or water throughout its history.

### Agricultural land use

**B.336** Land use within the District reflects the topography and soil types.

**B.337** To the north of the District, the poor soils of the flat reclaimed land is used for pasture. These former marshlands are characterised by a network of drainage ditches marked by reeds.

**B.338** The coastal land to the east of the District, although rich in biodiversity, is of little value for agriculture.

**B.339** The deep well-drained loamy soils west of Sandwich supports a belt of intensive horticultural production, with orchards, potatoes and field vegetables, viticulture, and some cereals. This agricultural land is generally classified as Grade 1 – the most valuable agricultural land.

**B.340** To the centre and south of the District the chalk bedrock supports an extensive cereal belt that thrives on the deep calcareous soils. Crops include wheat, oil seed rape, linseed oil and barley. This agricultural land is generally classified as Grade 1 and 2. Smaller, more enclosed fields around settlements or farmsteads are used for pasture.

**B.341** Parkland and woodland diversify the mostly arable land use to the south of the District, where the more undulating landform has a mix of Grade 2 and 3 agricultural land.

**B.342** On the steeper slopes of the chalk hills to the south, small pockets of species-rich unimproved grassland comprising areas of downland pasture, are interspersed with areas of scrub and native woodland.

### Landscape designations

**B.343** The Kent AONB extends across the south of the District and lies outside the scope of this study, although this study considered the interrelationships of landscape with the AONB including role as landscape setting.

### Landscape character types and areas

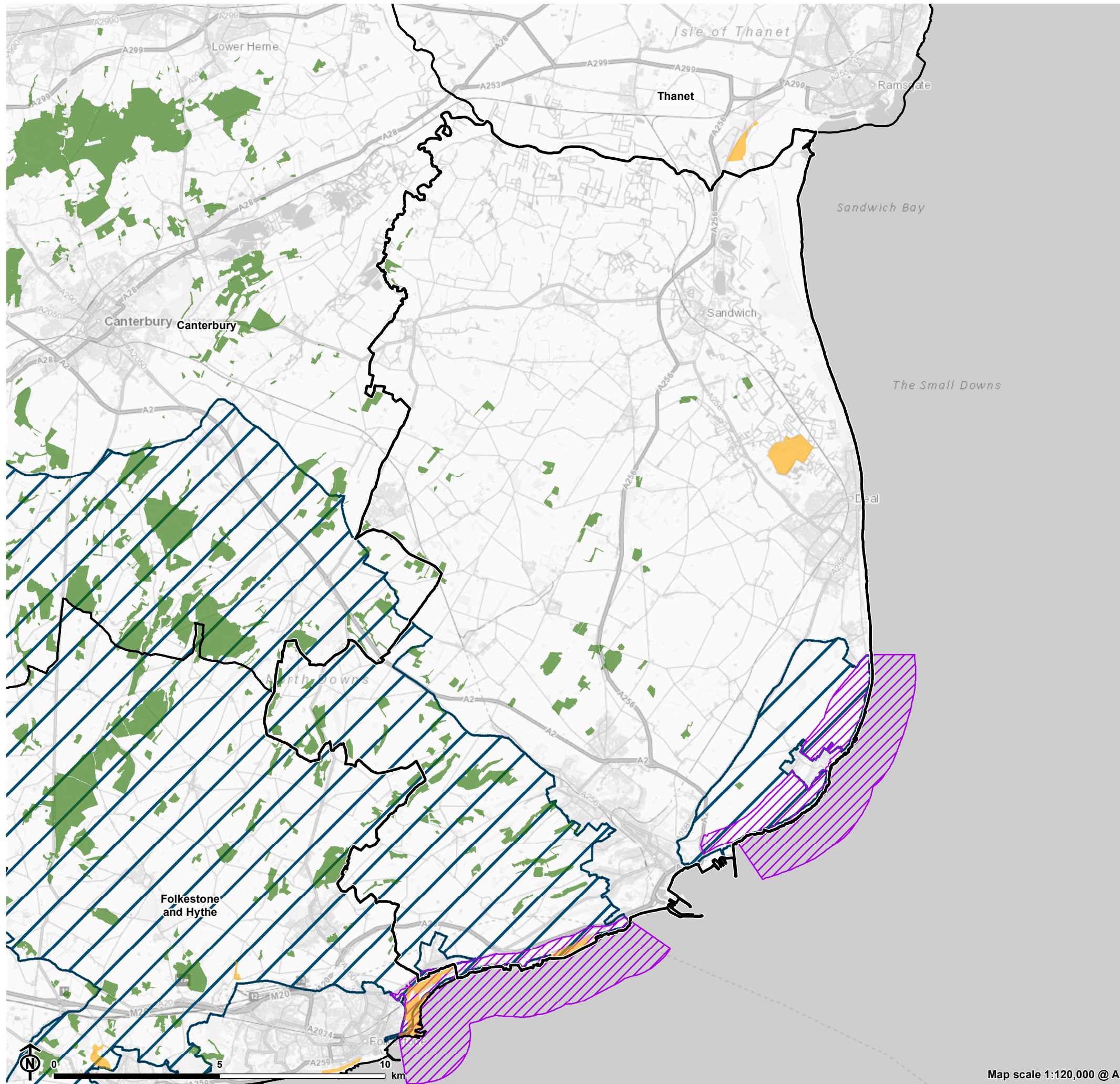
**B.344** The District is comprised of the following landscape character types and areas<sup>273</sup>:

- River Valleys and Marshes:
  - Little Stour Marshes.
  - Ash Levels.
  - Little Stour and Wingham River.
- Developed River Valley:
  - Great Stour – Sandwich Corridor
- Coastal Marshes and Dunes:
  - Sandwich Bay
  - Lydden Valley
- Horticultural Belt:
  - Preston
  - Ash
  - Staple Farmlands
- Open Arable Chalk Farmland with Parkland:
  - Shepherdswell Aylesham Parklands
  - Whitfield Parkland
- Open Arable Chalk Farmland with Woodland:
  - Chillenden
  - Northbourne
  - Ripple
- Chalk Hills:
  - Lydden Hills
  - Guston Hills
- Defensive Hills:
- Richborough Bluff

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<sup>273</sup> LUC (2020). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Heritage.aspx>)

Figure B.10: Landscape Designations



- District boundary
- Neighbouring district boundary
- Area of Outstanding Natural Beauty
- Country park
- Ancient woodland
- Heritage coast

Map scale 1:120,000 @ A3

## Sustainability issues and likely evolution without the Local Plan

**B.345** Key sustainability issues facing Dover are as follows:

- The District contains a number of distinct rural landscapes which could be harmed by inappropriate development. The Local Plan offers an opportunity to ensure that designated landscapes (such as the Kent Downs AONB and Special Landscape Area) are protected and enhanced as appropriate and that development outside these designations is sited and designed to take account of the variation in landscape character across the District (see SA objective 11).

## SA objectives

**Table B.9: Landscape SA objectives and appraisal questions**

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	SA11.1: Does the Plan protect the District's sensitive and special landscapes, seascapes and townscapes?  SA11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside, coastline and settlements?	Landscape Cultural Heritage Biodiversity Flora and Fauna



## **Appendix C**

### **Site Assessment Criteria and Assumptions**

Table C.1: Residential site assessment criteria and assumptions

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring	
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	All site options with the potential to deliver homes within the Plan period have the potential for positive effects on SA Objective 1.						A minor positive (+) is therefore recorded for all site options.	
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	2a – Access to local services and facilities	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	<p>Each criterion 2a to 2h is scored:</p> <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 8). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
		2b Open space, sport, recreation, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility, open country and registered common land OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility, open country and registered common land OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
		2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
		2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m <sup>1</sup> from primary or middle school	>1,200m from primary or middle school	
		2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
		2f Further and higher education facilities	<=500m further and higher education facilities	501-1,000m further and higher education facilities	N/A	1,001-2,000m further and higher education facilities	>2,000m further and higher education facilities	
		2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2,000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
		2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>2</sup> from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and wellbeing	2i AQMAs	N/A	N/A	All other sites	Site located within 500m of an AQMA  (The World Health Organisation's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO <sub>2</sub> has a gradient of 200-500m)	Site located within AQMA	<p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 2j to 2l score minor negative, then the score is significant negative.</p> <p>If only one criterion 2j to 2l scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>
		2j Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry	

<sup>1</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

<sup>2</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2k Exposure to noise pollution from roads and railways	N/A	N/A	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	
	2l Exposure to odour from waste facilities	N/A	N/A	All other sites	N/A	<400m to wastewater treatment works or established safeguarding zone) <=250m to waste management facility	
SA3: To deliver and maintain sustainable and diverse employment opportunities.	All site options with the potential to deliver employment opportunities have the potential for positive effects on SA Objective 3.						A minor positive (+) is therefore recorded for all site options.
SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	<p>Each criterion 4a to 4b and 2a to 2h is scored:</p> <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 10). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m <sup>3</sup> from primary or middle school	>1,200m from primary or middle school	
	2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
	2f Further and higher education facilities	<=500m from further and higher education facilities	501-1,000m from further and higher education facilities	N/A	1,001-2,000m from further and higher education facilities	>2,000m from further and higher education facilities	
	2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2,000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>4</sup> from town centre	>1,200m from town centre		
SA5: To promote sustainable forms of development that maintain and improve	5a Source Protection Zones	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	If any of the criteria score major negative then the score is significant negative.

<sup>3</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

<sup>4</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
the quality of the District's natural resources, including minerals, soils and waters.	5b Agricultural land classification	N/A	N/A	All other sites	Significant proportion (>=25%) of site on Grade 3 agricultural land  AND/OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site	Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land	If two or more of criteria 5a to 5c score minor negative, then the score is significant negative.  If only one criterion 5a to 5c scores minor negative, then the score is minor negative.  All other sites score negligible (0).
	5c Minerals Safeguarding Area	N/A	N/A	All other sites	Site is within a Minerals Safeguarding Area	N/A	
SA6: To reduce air pollution and ensure air quality continues to improve.	<p>The proximity of sites to Air Quality Management Areas (AQMAs) does not appropriately test the potential for such sites to generate road traffic through AQMAs. Furthermore, in isolation, individual sites options are likely to generate relatively minor effects on air quality. It is considered more appropriate to appraise the Plan's ability to reduce air quality over the Plan Period in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan's site allocations as a whole.</p> <p>The Council's Air Quality Study undertaken by Bureau Veritas (2020) identifies and assesses the likely effects of selected sites on the District's NO<sub>2</sub> or PM<sub>10</sub> levels. A handful of sites were found to have the potential to generate slight or moderate increases in NO<sub>2</sub> or PM<sub>10</sub> although, overall, the impact on local air quality conditions arising from increased traffic flows as a result of the implementation of the Local Development Plan can be described as not significant with regards to human receptors.</p>						All sites score a negligible uncertain effect against this objective (0?) at this stage.
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change. <sup>5</sup>	7a Intersection with flood risk areas	N/A	N/A	All other sites	>=25% of site within Flood Zone 2	>=25% of site within Flood Zone 3	A major negative scores a significant negative effect (-).  If two or more of criteria 7a to 7b score minor negative, then the score is significant negative.  If only one criterion 7a to 7b scores minor negative, then the score is minor negative.  All other sites score negligible (0).
	7b Intersection with surface water flooding areas	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	<p>Each criterion 4a to 4b and 2a to 2h is scored:</p> <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 10). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility  OR Loss of 25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility  OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m <sup>6</sup> from primary or middle school	>1,200m from primary or middle school	

<sup>5</sup> Dover District Council's Level 1 Strategic Flood Risk Assessment (2019) refers to flood risk areas, including areas at risk from surface water flooding and flooding from reservoirs. LUC has reviewed the flood risk from reservoirs data, which has no effect on any of the reasonable alternative site options.

<sup>6</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
	2f Further and higher education facilities	<=500m from further and higher education facilities	501-1,000m from further and higher education facilities	N/A	1,001-2,000m from further and higher education facilities	>2,000m from further and higher education facilities	
	2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
	2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>7</sup> from town centre	>1,200m from town centre	
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	9a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential' or 'rural residential' IRZ. The 'residential' and 'rural residential' IRZs use the following unit categories to establish relevance of IRZ:  <ul style="list-style-type: none"> <li>■ 500+</li> <li>■ 100+</li> <li>■ 50+</li> <li>■ 10+</li> </ul> Using the density assumption of 30dph, only sites capable of accommodating units equal to or more than these categories rate light red.	Intersects with designated site	If any of the criteria score major negative then the score is significant negative.  If two or more of criteria 9a to 9d score minor negative, then the score is significant negative.  If only one criterion 9a to 9d scores minor negative, then the score is minor negative.  All other sites score negligible (0).
	9b Proximity to locally designated wildlife sites and ancient woodland			All other sites	<=250m from designated site boundary	Intersects with designated site	
	9c Presence of Proximity Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat			All other sites	Intersects with habitat	N/A	
	9d Presence of geological sites	N/A	N/A	All other sites	<=25% intersects with county/local geological site	>=25% intersects with county/local geological site	
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	HELAA Historic Environment Assessment covering nationally and locally designated and non-designated heritage assets	N/A	N/A	Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in	A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/ or, where assets of low significance	A significant negative effect occurs where, as result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change.	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment.

<sup>7</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
				which it is perceived or understood.	may experience physical or setting change, resulting in any degree of effect (minor to significant).		
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	HELAA Landscape Environment Assessment Landscape Sensitivity	N/A	N/A	Site is of low landscape sensitivity	Site is of moderate or low-moderate landscape sensitivity	Site is of high or moderate-high landscape sensitivity	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment.

Table C.2: Employment site assessment criteria and assumptions

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring	
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	All employment site options will have a negligible (0) effects on SA Objective 1.						A negligible (0) is therefore recorded for all site options.	
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	2a – Access to local services and facilities	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	<p>Each criterion 2a to 2d is scored:</p> <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
		2b Open space, sport, recreation, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country and registered common land OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport, recreation facility, open country and registered common land OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
		2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
		2d Primary and middle schools	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>8</sup> from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and wellbeing	2f AQMA	N/A	N/A	All other sites	Site located within 500m of an AQMA  (The World Health Organisation's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO <sub>2</sub> has a gradient of 200-500m)	Site located within AQMA	
	2g Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry		

<sup>8</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2h Exposure to odour from waste facilities	N/A	N/A	All other sites	N/A	<400m to wastewater treatment works or established safeguarding zone) <=250m to waste management facility	
SA3: To deliver and maintain sustainable and diverse employment opportunities.	All site options with the potential to deliver employment opportunities have the potential for positive effects on SA Objective 3.						A minor positive (+) is therefore recorded for all site options.
SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	<p>Each criterion 4a to 4b and 2a to 2d is scored:</p> <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> <p>Scores totalled, and then averaged (i.e. total score divided by 6). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>9</sup> from town centre	>1,200m from town centre	
SA5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters.	5a Source Protection Zones	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	<p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 5a to 5c score minor negative, then the score is significant negative.</p> <p>If only one criterion 5a to 5c scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>
	5b Agricultural land classification	N/A	N/A	All other sites	Significant proportion (>=25%) of site on Grade 3 agricultural land  AND/OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site.	Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land	
	5c Minerals Safeguarding Area	N/A	N/A	All other sites	Site is within a Minerals Safeguarding Area	N/A	
SA6: To reduce air pollution and ensure air quality continues to improve.	The proximity of sites to Air Quality Management Areas (AQMAs) does not appropriately test the potential for such sites to generate road traffic through AQMAs. Furthermore, in isolation, individual sites options are likely to generate relatively minor effects on air quality. It is considered more appropriate to appraise the Plan's ability to reduce air quality over the Plan Period in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan's site allocations as a whole.						All sites score a negligible uncertain effect against this objective (0?) at this stage.

<sup>9</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	The Council's Air Quality Study undertaken by Bureau Veritas (2020) identifies and assesses the likely effects of selected sites on the District's NO <sub>2</sub> or PM <sub>10</sub> levels. A handful of sites were found to have the potential to generate slight or moderate increases in NO <sub>2</sub> or PM <sub>10</sub> , although, overall, the impact on local air quality conditions arising from increased traffic flows as a result of the implementation of the Local Development Plan can be described as not significant with regards to human receptors.						
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change.	7a Intersection with flood risk areas	N/A	N/A	All other sites	>=25% of site within Flood Zone 2	>=25% of site within Flood Zone 3	A major negative scores a significant negative effect (--).  If two or more of criteria 7a to 7b score minor negative, then the score is significant negative.  If only one criterion 7a to 7b scores minor negative, then the score is minor negative.  All other sites score negligible (0).
	7b Intersection with surface water flooding areas	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion 4a to 4b and 2a to 2d is scored:  <ul style="list-style-type: none"> <li>■ Significant positive +3</li> <li>■ Minor positive +1</li> <li>■ Minor negative -1</li> <li>■ Significant negative -3</li> </ul> Scores totalled, and then averaged (i.e. total score divided by 6). Overall significance is scored as follows: <ul style="list-style-type: none"> <li>■ Significant positive &gt;= +2</li> <li>■ Minor positive &gt;0 to &lt;2</li> <li>■ Negligible 0</li> <li>■ Minor negative &lt;0 to &lt;-2</li> <li>■ Significant negative &gt;= -2</li> </ul>
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility  OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility  OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Town centre	<=400m from town centre	401-800m from town centre	N/A	801-1,200m <sup>10</sup> from town centre	>1,200m from town centre	
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	9a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ	Intersects with designated site	If any of the criteria score major negative then the score is significant negative.  If two or more of criteria 9a to 9d score minor negative, then the score is significant negative.  If only one criterion 9a to 9d scores minor negative, then the score is minor negative.  All other sites score negligible (0).
	9b Proximity to locally designated wildlife sites and ancient woodland			All other sites	<=250m from designated site boundary	Intersects with designated site	
	9c Presence of Proximity Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat			All other sites	Intersects with habitat	N/A	
	9d Presence of geological sites	N/A	N/A	All other sites	<=25% intersects with county/local geological site	>=25% intersects with county/local geological site	

<sup>10</sup> This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.



SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	HELAA Historic Environment Assessment covering nationally and locally designated and non-designated heritage assets	N/A	N/A	Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in which it is perceived or understood	A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/or, where assets of low significance may experience physical or setting change, resulting in any degree of effect (minor to significant)	A significant negative effect occurs where, as a result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	HELAA Landscape Environment Assessment Landscape Sensitivity	N/A	N/A	Site is of low landscape sensitivity	Site is of moderate or low moderate landscape sensitivity	Site is of high or moderate-high landscape sensitivity	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment

## **Appendix D**

### **Reasons for the Selection of Sites in Light of the Reasonable Alternatives**



# The Selection of Site Allocations for the Regulation 19 Submission Local Plan September 2022



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# The Selection of Site Allocations for the Regulation 19 Submission Local Plan

The purpose of this Topic Paper is to set out the background to the selection of the proposed housing, gypsy and traveller pitches and employment site allocations for the Regulation 19 Local Plan.

It provides an update to the Topic Paper that was published with the Regulation 18 Draft Local Plan (Appendix 1), which set out the reasoning behind the selection of specific site options within the District. It should be read in conjunction with the previous Topic Paper.

## Overarching Growth Strategy

As part of the preparation of the Local Plan the Council has identified and appraised a range of growth and spatial options for Dover District through the Sustainability Appraisal (SA) process:

- Growth options - range of potential scales of housing and economic growth that could be planned for;
- Spatial options - range of potential locational distributions for the growth options.

By appraising all the options (known as reasonable alternatives), the SA provides an assessment of how different options perform in environmental, social and economic terms, which helps inform which option should be taken forward for the overall strategy. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision.

The SA identified and appraised five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations):

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and Economic Land Review).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Core Strategy with Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario.

However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing

and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

Sites have therefore been selected in accordance with the preferred option for the distribution of housing and economic growth, based on their suitability, availability, and achievability.

## Settlement Hierarchy

To support the consideration of the Growth Options through the Sustainability Appraisal process a review of the Settlement Hierarchy was undertaken.

The purpose of the Settlement Hierarchy Study was to identify those settlements in the District that are the most sustainable, based on the range of facilities and services present. It focuses in particular on the rural settlements of the District, given that the sustainability credentials of the district's three main centres of Dover, Deal and Sandwich are well-established.

The NPPF and NPPG require that Local Planning Authorities promote sustainable development in rural areas to support the vitality of their rural communities. New housing can enable rural communities to retain their existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

The continued national policy emphasis on sustainable development means that housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich, with new development in the rural areas limited and focused on villages commensurate with their scale and position in the hierarchy, unless local factors, including flood risk and environmental designations, dictate otherwise. As the Settlement Hierarchy Study and its predecessor have established, Dover District has a large number of smaller settlements distributed across the rural areas of the District, with only a small number of larger villages. The Settlement Hierarchy Study indicates that it is therefore appropriate that the distribution of new housing in the rural areas of the district reflects such a settlement pattern.

The Council has used the Settlement Hierarchy Study to inform the proposed site allocations for the Local Plan and determine how much development an individual settlement should accommodate based on its position in the revised Settlement Hierarchy.

## Housing Sites

### Identification and Assessment of Housing Sites

The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The HELAA has been prepared in accordance with the guidance set out in the Government's Planning Practice Guidance <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

As part of the HELAA process officers compiled a comprehensive list of housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in sites being removed.

The remaining sites were then taken forward for more detailed assessment. The first stage of this process involved a desktop review using GIS to identify any relevant on-site constraints. Following this, sites were then physically surveyed and assessed to determine their suitability and development potential (i.e number of houses that could be delivered on the site) using the following criteria:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

In addition to this, comments were also sought from key stakeholders (including KCC Highways, DDC Heritage Officer, Landscape Architect, Environment Agency and the Kent Downs AONB Unit) with regards to the suitability of some of the sites.

Ward Councillors were consulted in 2019, following which a series of meetings were held with Town and Parish Councils in February/March 2020. The draft HELAA was published on the Council's website in April 2020. This concluded that there were 126 suitable or potentially suitable and available or potentially available sites, with a capacity to accommodate 12,111 dwellings.

The draft HELAA (April 2020) was subsequently updated to take account of:

- Further evidence requested by officers in relation to highways constraints identified on certain sites;
- New availability evidence;
- Viability evidence in respect of achievability;
- Comments made as part of the wider engagement on the HELAA sites;
- Sites which now have planning permission.

## December 2020 HELAA

The December 2020 HELAA was then published in January 2021 alongside the Reg 18 draft Local Plan and identified:

- 93 sites as suitable<sup>1</sup>;
- 41 sites as potentially suitable<sup>2</sup>; and

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<sup>1</sup> Suitable is defined in the HELAA as: *'site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.'*

<sup>2</sup> Potentially suitable is defined in the HELAA as: *'site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.'*



- 197 sites as unsuitable<sup>3</sup>.

The 134 suitable and potentially sites had capacity to accommodate in the region of 13,654 dwellings based upon assessment carried out at that time.

The availability assessment of the suitable and potentially suitable sites identified:

- 114 sites as available<sup>4</sup>;
- 12 sites as potentially available<sup>5</sup>; and
- 8 sites as unavailable<sup>6</sup>.

## Reg 18 Targeted Call for Sites

A targeted call for sites was undertaken alongside the consultation on the Regulation 18 draft Local Plan. As part of this exercise the following types of site were requested:

- Gypsy and Travellers and Travelling Show-people
- Self-build and Customhouse Building (0.25ha size or 5 units or more)
- Employment Use (500sqm floor space or more)
- Housing sites between 0.25 and 1 hectare in size
- Local Green Space nominations

120 sites were submitted for consideration. These sites were then subject to a stage 1 desk based assessment in accordance with the methodology outlined above, which led to 68 sites being eliminated. The 3 Local Green Spaces submitted as part of the call for sites were sifted out and considered separately.

Of the 49 sites taken forward to Stage 2:

- 36 sites were either housing or self-build sites;
- 5 sites were Gypsy and Traveller sites;
- 6 sites were employment sites; and
- 2 sites (TC4S083 and TC4S100) were submitted for mixed use and have therefore been considered as part of the assessment of housing sites and part of the assessment of employment sites.

Officers then undertook a suitability assessment of the 36 housing/ self-build and 2 mixed use sites (TC4S083 and TC4S100) sites taken forward to stage 2 based on the methodology set out above.

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<sup>3</sup> Unsuitable is defined in the HELAA as: *'site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.'*

<sup>4</sup> Available is defined in the HELAA as: *'landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.'*

<sup>5</sup> Potentially available is defined in the HELAA as: *'Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.'*

<sup>6</sup> Unavailable is defined in the HELAA as: *'The landowner/ site promoter has confirmed that the land is not available for development in the next 15-20 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.'*

Further engagement was also undertaken with KCC Highways, The Kent Downs AONB Unit, the Council's Heritage Officer, the EA and Natural England where further clarification was required concerning on or off-site constraints.

The suitability assessment of the sites identified:

- 12 housing sites as suitable;
- 4 housing sites and 1 mixed use site (TC4S083) as potentially suitable for housing; and
- 20 housing sites and 1 mixed use site (TC4S100) as unsuitable for housing.

Sites assessed as being suitable or potentially suitable were then subject to an availability and achievability assessment in accordance with the HELAA methodology. This concluded that the 16 housing sites and 1 mixed use site (TC4S083) were available, 10 housing sites were achievable, 2 housing sites and 1 mixed use site (TC4S083) were marginally achievable and the 4 Dover housing sites were unachievable.

### Reg 18 responses to draft Local Plan and HELAA December 2021

As part of the Regulation 18 consultation, representations were also made on both the proposed site allocations identified in the Plan and on existing HELAA sites not proposed as allocations in the draft Local Plan. The Council's response to these comments is reported in the Local Plan Consultation Statement.

### Reg 19 HELAA September 2022

The HELAA has been updated to take account of:

- Representations made through the Regulation 18 consultation on the draft Local Plan;
- Sites which now have planning permission or resolution to grant subject to S106;
- Changes to the capacity of sites;
- Further technical work;
- Further engagement with key stakeholders; and
- Further site assessment work.

Since the HELAA was published in January 2021, 1 site SHE013 has changed from being deleted to being included and this results in 365 sites within the existing HELAA. Of the 365 sites, 46 have gained planning permission or are subject to permission and are awaiting completions of a S106 legal agreement and 5 are allocated in the Ash Neighbourhood Plan made by the Council in September 2021. Of the remaining 314 sites the follow assessments apply:

Suitability Assessment:

- 72 sites are suitable
- 11 sites are potentially suitable
- 223 sites are unsuitable
- 8 sites have mixed suitability

Availability Assessment

Of the 91 sites that are part suitable or suitable and are part potentially suitable or potentially suitable:

- 80 sites are available
- 11 sites are unavailable

Achievability Assessment

Of the 80 sites that were part suitable or suitable and are part potentially suitable or potentially suitable and are available:

- 58 sites achievable
- 8 sites marginally achievable
- 14 sites unachievable

The 14 sites assessed as unachievable are within the Dover urban area. Review of these sites has determined that development would facilitate needed regeneration and by removing the policy requirement for 30% of dwelling to be affordable would allow the sites to become achievable.

Further details of the HELAA process can be found in the Council's HELAA Report September 2022.

## Site Specific Sustainability Appraisal of Housing Sites

As part of the Sustainability Appraisal of the Regulation 18 draft Local Plan, site specific Sustainability Appraisal assessments were carried out on the 126 HELAA sites that were assessed as being suitable or potentially suitable and available or potentially available. In addition to this, a further 8 sites were also subjected to SA alongside the other 126 sites on a precautionary basis. These were sites where the Council had been unable to contact the landowners to confirm their availability before the SA work was carried out.

Following the Regulation 18 consultation on the draft Local Plan further site specific Sustainability Appraisals were carried out on the suitable and potentially suitable sites assessed as part of the targeted call for sites and three HELAA sites that previously hadn't been subject to SA as they were unsuitable.

Each residential site option was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal (see Sustainability Appraisal Report). To ensure that all site options were appraised to the same level of detail in the SA, all options have been appraised at a high level based on the potential capacity of each site using each sites redline boundary and the Council's most up-to-date evidence base.

The Sustainability Appraisal then organised the sites by settlement, with the strongest site options at the top and the weaker performing site options at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects

Where the status of HELAA sites has changed through the process the SA has been updated to reflect this. Sites which either now have planning permission or are now considered to either be unsuitable or unavailable no longer constitute reasonable alternatives for the Local Plan to consider for site allocation purposes. Sites that had boundary changes and amendments to them were considered as reasonable alternatives were subject to SA. The preferred site boundary alternatives and their reasoning have been set out within Appendix B.

Whilst the SA has informed the site allocation selection, the overall 'score' from the Sustainability Appraisal process was not the only determining factor (see below). This is due to a number of reasons. First, its not possible in the SA to compare scoring in different areas of the District, for example the towns, which score highly on access to services, to sites in rural settlements with more limited access. This inevitable lower score should not in itself mean that a site in a rural location is

not 'suitable' for allocation. Therefore sites with lower scores than other 'reasonable alternatives' in a different settlement may have been allocated. If site score alone was the determining factor in site allocation this would result in allocations in a very limited range of locations.

Second, when considering the cumulative impact of development and the overall distribution of allocations across the District, a site with a positive score in the SA may be located in a rural settlement which already has a number of other highly scoring 'suitable' sites, and the Council considers that it would not be sustainable to allocate all of them in one plan period due to the negative impact of cumulative development on the particular settlement. In another scenario, sites may score more positively than a selected allocation, but the allocation of them would not be in accordance with the overall distribution strategy of the Local Plan set out in SP3.

Third, the site specific Sustainability Appraisal work identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA against SA objectives 5 (Air Pollution), 7 and (Flood Risk) and 9 (Biodiversity) through the policies in the Plan.

## Site Selection for Allocation

In order to meet the level of identified housing need, the Local Plan is required to allocate sites for housing to meet the residual housing requirement of 4,666 homes over the Plan period to 2040.

In determining the sites to be taken forward as housing allocations in the Local Plan the Council has had regard to:

- HELAA technical evidence and site assessments
- The overarching growth strategy set out in the Local Plan
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan
- Housing need and supply
- The revised settlement hierarchy
- The planning status of a site
- The availability of a site
- The Whole Plan Viability Study
- The Air Quality Study
- Sequential and Assessment Test of the proposed allocations
- The Local Plan Transport Modelling Work; and
- Representations made by key stakeholders, site promoters and the local community.

## Proposed Regulation 18 Housing Allocations

The Regulation 18 Local Plan identified sites to deliver 7,511 new homes over the Plan period, of which 3,690 homes were proposed on strategic sites and 3,821 were proposed on non-strategic housing sites.

Strategic housing allocations included:

- The urban expansion of Whitfield;
- Land to the North of Aylesham;

- Land to the South of Aylesham;
- Land between Elvington and Eythorne

A number of non-strategic allocations were also proposed in Site Allocations Policy 1 of the draft Regulations 18 Local Plan.

The justification for the inclusion of these sites as proposed housing allocations, and conversely the exclusion of others, was set out in Appendix E of the SA of the draft Reg 18 Local Plan and the Site Selection Topic Paper that was published to support the Regulation 18 Local Plan (Appendix A).

The proposed housing allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, further information was also requested from land owners/ site promoters of the proposed allocations to demonstrate the sites deliverability. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

## Proposed Regulation 19 Housing Allocations

The Strategic and Non-Strategic housing allocations in the Regulation 19 Local Plan have been updated following the Regulation 18 consultation to take into account:

- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process.
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites – to take into account changes to the planning status of a site; changes in suitability following re-assessment and changes in availability of sites;
- Further site specific SA work;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding, sequential test of sites and minerals assessment work.

This has resulted in the following sites being removed from the Regulation 19 Local Plan:

- AYL004 – North Aylesham. Site proposed for 500 homes. Removed due to concerns in relation to the cumulative impact upon the highways network. The AYL003 site is considered to be the best option to deliver the further expansion to Aylesham due to its relationship with the existing settlement, proximity to transport connections and services and facilities, and the development is considered to have a lesser impact on the amenity of existing residents, in addition to a lesser landscape and visual impact.
- DOV012 – Farthingloe. Site proposed for 100 homes. Site removed due to objections from AONB unit and Natural England. No clear mitigation or justification has been provided for major development in the AONB.
- DOV025 - Land off Wycherley Crescent Dover. Site proposed for 10 homes. Previous Local Plan allocation. Site is a designated Local Wildlife Site and has been removed as impact cannot be mitigated.
- EAS012 – Lower Gore Field Eastry. Site proposed for 35 homes. Site is no longer available for housing.
- EYT019 – Land to east of Adelaide Road, Eythorne. Site proposed for 6 homes. Removed as it will form part of the access to the strategic allocation in Elvington.

- SHE003 - Land to the north of Westcourt Lane, Shepherdswell. Site proposed for 100 homes. Removed due to highway safety concerns raised by KCC highways and significant objections to scale and impact of development at Regulation 18 stage.
- WHI006 – Former Guide Hut, Whitfield. Site proposed for 10 homes. Site removed as no longer available for housing.
- EYT001 – Land at Monkton Court Lane. Site proposed for 20 units. Site covered by a surface water flow path which constrains development here.

The following sites have also been removed as they are now subject to planning permission or resolution to grant. These sites still contribute to meeting the Plan’s housing requirement, being part of the extant supply.

- ASH010
- AYL002
- DEA018
- DEA020
- DEA021
- DOV009
- EAS011
- GUS002
- NOR005
- SAN015
- SHO004
- SHO002 (part of the site has planning permission, the remainder of the site is unsuitable as therefore not considered for allocation)
- STA009
- WOO002

All the site allocations in Ash have been removed from Regulation 19 Local Plan as they are covered by the Ash Neighbourhood Plan which was adopted in September 2021, which includes these site allocations. This includes ASH003, ASH004, ASH011, ASH014, ASH015.

The following sites remain as allocations in the Regulation 19 Local Plan, however their capacity has been amended to take into account comments made at Regulation 18 stage and updated site assessments and evidence.

Site Reference	Address	Reg 18 Housing Number	Reg 19 Housing Number	Reason for Change
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	18	10	To mitigate the impact upon the AONB
CAP013	Land at Cauldham Lane, Capel-le-Ferne	15	5	To mitigate the impact upon the AONB
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	100	75	To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided

DOV017	Dover Waterfront	200	263	To reflect the current masterplan for the site
DOV022B	Land including gas holder, Coombe Valley, Dover	40	80	To reflect the landowners aspirations for the site, and additional adjoining land
DOV022E	Land in Coombe Valley, Dover	220	150	To mitigate visual and landscape impacts
DOV023	Buckland Mill, Dover	124	135	To reflect current planning application for the site
DOV026	Westmount College, Folkestone Road, Dover	100	60	To reflect the landowners aspirations for the site
EYT003/009/012	Land between Eythorne and Elvington	350	300	To reduce the cumulative impact on the highways network
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	90	50	To mitigate visual and landscape impact on the AONB.
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	65	30	To take into account the area of the site at risk from surface water flooding
PRE003	Apple Tree Farm, Stourmouth Road	12	5	To reflect the landowners aspirations for the site
PRE016	Site north of Discovery Drive, Preston	35	20	
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	75	40	
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	80	35	To reflect the landowners aspirations for the site
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	60	40	To take into account the area of site at risk from surface water flooding
SAN023	Land at Archers Low Farm, St George's Rd	40	35	To mitigate the impact on adjacent trees and wider landscape
SHE006	Land west of Coxhill Road, Shepherdswell	20	10	To take into account the area of site at risk from surface water flooding
WIN014	Footpath Field, Staple Rd, Wingham	50	75	Following further assessment of potential site capacity
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	20	15	To reflect the landowners aspirations for the site

The following sites have been added as new housing allocations in the Regulation 19 Local Plan, following the Targeted Call for Sites undertaken at Regulation 18 and the review of existing HELAA sites based on comments made at Regulation 18.

Site Reference	Address	Settlement	Capacity	Reason for Allocation
DOV017	Bench Street, Dover Town Centre	Dover	100	Site forms part of the current Dover Waterfront site allocation in the Land Allocations Local Plan (2015). Site identified in the Regulation 18 Draft Local Plan as a development opportunity in the Dover Town Centre policy. A site allocation policy is however required to take forward the regeneration of this site.
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	40	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where criteria are set out in the site allocations policies these will need to be addressed as part of the planning application process. Development of the site provides the opportunity to enhance the Scheduled Monument. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA in relation to the Thanet Coast and Sandwich Bay. This mitigation should be delivered in accordance with the relevant policies in the Plan.
STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe	St Margaret's	10	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.



RIN002	Land at Ringwould Alpines, Dover Road, Ringwould	Ringwould	5	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.
TC4S008	Bridleway Riding School, Station Road Deal	Deal	25	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.
SHE013	Land around Coldred	Dover	5	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S074	Land adjacent Courtlands, Kingsdown	Kingsdown	5	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S082	Land Adjacent Mill House, Shepherdswell	Shepherdswell	10	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S023	Land adjacent to Cross Farm, Eastry, Near Sandwich	Eastry	10	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S027	Roosevelt Road, Dover	Dover	10	Small site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to

				accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S047	104 Northwall Road, Deal	Deal	8	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S039	Chapel Hill, Eythorne	Eythorne	5	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S030	Colton Crescent, Dover	Dover	10	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S028	Peverell Road, Dover	Dover	6	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S026	Military Road, Dover	Dover	9	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
Part of DOV012	Western Heights	Dover	100	Regeneration of site is needed to secure the future of this important heritage asset. Site would deliver a mix of uses including housing. Site covered by the Western Heights SPD.
TC4S032	Ethelbert Road garages, Deal	Deal	5	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.

Sites that have been selected for allocation in the Local Plan from the HELAA and TC4S are considered to be the most suitable sites to deliver the Council's housing growth strategy. Furthermore, where constraints have been identified on sites identified for allocation, it is considered that these can be mitigated through the Local Plan and planning application process. Conversely, where sites have been identified as suitable/ potentially suitable and available in the HELAA/TC4S but have not been selected as Local Plan allocations, this is because the site is considered not to be in accordance with the Council's growth strategy at this time, in conflict with SP4 of the Local Plan and/or be subject to other constraints that would prevent them from being brought forward at this time.

The final list of sites included as housing allocations for the Regulation 19 Local Plan is set out below. The proposed allocations amount to 5,592 dwellings in total.

<b>HELAA Reference</b>	<b>Location</b>	<b>Settlement</b>	<b>Agreed Housing Number</b>
ALK003	Land at Short Lane, Alkham	Alkham	10
AYL001	Land at Dorman Avenue	Aylesham	9
AYL003	Land to the south of Spinney Lane, Aylesham	Aylesham	640
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	Capel-le-Ferne	70
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	Capel-le-Ferne	10
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	Capel-le-Ferne	10
CAP013	Land at Cauldham Lane, Capel-le-Ferne	Capel-le-Ferne	5
DEA008	Land off Cross Road, Deal	Deal	100
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	Deal	75
TC4S008	Bridleway Riding School, Station Road, Deal	Deal	25
TC4S032	Ethelbert Road garages, Deal	Deal	5
TC4S047	104 Northwall Road, Deal	Deal	8
GTM003	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	10
DOV006	Land at Dundedin Drive (south), Dover	Dover	8
DOV008	Land adjoining 455 Folkestone Road, Dover	Dover	5

<b>HELAA Reference</b>	<b>Location</b>	<b>Settlement</b>	<b>Agreed Housing Number</b>
DOV017	Dover Waterfront and Bench Street	Dover	363
DOV018	Mid Town	Dover	100
DOV019	Albany Place Car Park, Dover	Dover	15
DOV022B	Land in Coombe Valley, Dover	Dover	80
DOV022C	Land in Coombe Valley, Dover	Dover	20
DOV022E	Land in Coombe Valley, Dover	Dover	150
DOV023	Buckland Mill, Dover	Dover	135
DOV026	Westmount College, Folkestone Road, Dover	Dover	60
DOV028	Charlton Shopping Centre, High Street, Dover	Dover	100
DOV030	Land at Durham Hill, Dover	Dover	10
WHI001	Urban Extension to Whitfield	Whitfield	2200
TC4S026	Land at Military Road, Dover	Dover	9
TC4S027	Land at Roosevelt Road, Dover	Dover	10
TC4S028	Land at Peverell Road, Dover	Dover	6
TC4S030	Land at Colton Crescent, Dover	Dover	10
Part of DOV012	Western Heights, Dover	Dover	100
EAS002	Land at Buttsole Pond, Lower Street, Eastry	Eastry	80
EAS009	Eastry Court Farm, Eastry	Eastry	5
TC4S023	Land adjacent to Cross Farm, Eastry	Eastry	10
EYT003	Land adjoining Terrace Road, Elvington	Elvington	125
EYT008	Land on the south eastern side of Roman Way, Elvington	Elvington	50
EYT009	Land to the east of Terrace Road, Elvington	Elvington	125
EYT012	Sweetbriar Lane, Elvington	Elvington	50
TC4S039	Land at Chapel Hill, Eythorne	Eythorne	5

<b>HELAA Reference</b>	<b>Location</b>	<b>Settlement</b>	<b>Agreed Housing Number</b>
GOO006	Land adjacent to Short Street, Chillenden	Chillenden	5
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	Kingsdown	50
TC4S074	Land adjacent to Courtlands, Kingsdown	Kingsdown	5
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	East Langdon	40
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Lydden	30
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	Nonington	35
PRE003	Apple Tree Farm, Stourmouth Road	Preston	5
PRE016	Site north of Discovery Drive, Preston	Preston	20
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	Preston	40
RIN004	Ringwould Alpines, Dover Road, Ringwould	Ringwould	5
RIN002	Ringwould Alpines, Dover Road, Ringwould	Ringwould	5
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	40
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	Sandwich	32
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	35
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	35
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	40
SAN019	Sydney Nursery, Dover Road, Sandwich	Sandwich	10
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	35
SHE004	Land at Shepherdswell between St Andrew's Gardens, Mill Lane and Meadow View Road	Shepherdswell	40
SHE006	Land west of Coxhill Road, Shepherdswell	Shepherdswell	10

HELAA Reference	Location	Settlement	Agreed Housing Number
SHE008	Land off Mill Lane, Shepherdswell	Shepherdswell	10
TC4S082	Land Adjacent to Mill House, Shepherdswell	Shepherdswell	10
SHE013	Land opposite the Conifers Coldred	Coldred	5
STA004	Land at Durlock Road, Staple	Staple	3
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	St Margaret's at Cliffe	40
STM006	Land at New Townsend Farm, Station Road, St Margarets	St Margaret's	10
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B)	St Margaret's	18
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)	St Margaret's	18
STM010	Land located between Salisbury Road and The Droeway, St Margarets-at-Cliffe	St Margaret's	10
WIN003	Land adjacent to Staple Road	Wingham	20
WIN004	Land adjacent to White Lodge, Preston Hill	Wingham	8
WIN014	Footpath Field, Staple Road, Wingham,	Wingham	75
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	5
WOO006	Land south of Sandwich Road, Woodnesborough	Woodnesborough	10
WOR006	Land to the east of Jubilee Road	Worth	10
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	Worth	15

The Regulation 19 Local Plan groups the site allocation policies by settlement to reflect the agreed settlement hierarchy.

The strategic housing sites are covered by Strategic Policies: this includes the Whitfield Urban Expansion, South Aylesham and Eythorne and Elvington.

Housing sites over 30 dwellings are covered by Non-Strategic Policies. This includes:

- DOV017 (Dover Waterfront and Bench Street)
- DOV018
- DOV022B

- DOV022E
- DOV023
- DOV026
- DOV028
- TC4S083
- DEA008
- WAL002
- SAN004
- SAN006
- SAN007
- SAN008
- SAN013
- SAN023
- EAS002
- EYT008
- SHE004 and TC4S082 - covered by one policy
- STM003
- STM007 and STM008 - covered by one policy
- WIN014
- CAP006
- KIN002
- LAN003
- LYD003
- PRE003, PRE016 and PRE017 - covered by one policy
- NON006

The remaining sites, under 30 dwellings, are covered by a small sites policy for each settlement. The small sites policies take the form of a table that sets out the key considerations for each site.

## Gypsy and Traveller Sites

### Identification and Assessment of Gypsy and Traveller Sites

The NPPF requires Local Plans to include provision for the needs of Gypsy and Travellers. This is informed by a Gypsy and Traveller Accommodation Assessment which has been carried out for Dover District Council by consultants arc4.

The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arc4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover on existing sites in the District, and 19 potential pitches on existing sites, resulting in a residual need to identify 13 pitches. Three site options were identified for assessment:

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.

The assessment drew on site analysis undertaken by arc4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

The site South of Ash Road was discounted as unsuitable due to the site being located in flood zone 2 and 3, the need for significant highways and water mains connections work and its distance from schools, health and local services.

The land to the south of Alkham Valley Road, Alkham was assessed as being suitable and the land to the North of Snowdown Caravan Site was assessed as being potentially suitable.

In addition to potential new sites, the Gypsy and Traveller Accommodation Assessment (GTAA) site review update January 2020 identified and assessed 5 existing Gypsy and Traveller sites for the potential to intensify the number of pitches on them. The findings of the assessment were published in the GTAA Final report published in March 2020.

A targeted call for sites was carried out alongside the Regulation 18 consultation on the draft Local Plan. Five Gypsy and Traveller sites were submitted in response to this. Following the HELAA methodology outlined above, one site was assessed as being suitable and four sites were assessed as unsuitable.

## Sustainability Appraisal of Gypsy and Traveller Sites

Gypsy and traveller site options assessed as being either suitable or potentially suitable in the HELAA have been appraised through the Sustainability Appraisal (4 sites in total).

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.
- Half Acres, Halfacres, Short Lane, Alkham.<sup>7</sup>

The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward.

The five intensification sites identified in the GTAA 2020 were not appraised through the Sustainability Appraisal due to their existing established use and that they were small sites below the HELAA site threshold.

## Site Allocation Selection

In determining the sites to be taken forward as gypsy and traveller allocations in the Local Plan the Council has had regard to:

- The overarching growth strategy;
- The requirement to meet the level of need identified in the Gypsy and Traveller Accommodation Assessment;
- The availability of sites for gypsies and travellers;
- The suitability of the identified sites for gypsies and travellers; and
- Representations made by key stakeholders and site promoters.

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<sup>7</sup> This site has subsequently being granted planning permission for 1 pitch and has therefore become a site for intensification.



## Regulation 18 Proposed Gypsy and Traveller Allocations

The draft Reg 18 Local Plan proposed to meet the identified need for 42 gypsy and traveller pitches in the District over the Plan period in the following way:

- 10 pitches available through vacancies due to turnover on existing sites.
- 9 pitches provided through suitable intensification of existing sites.
- Through the allocation of both the site in Alkham for 10 pitches and the site in Aylesham for 10 pitches.

The justification for the inclusion of these sites as proposed gypsy and traveller allocations, was set out in the Reg 18 Site Selection Topic Paper (Appendix A).

The proposed gypsy and traveller allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

## Regulation 19 Proposed Gypsy and Traveller Allocations

The Council's strategy for meeting the needs of Gypsies and Travellers in the Regulation 19 Local Plan has been updated following the Regulation 18 consultation to take into account:

- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process, including concerns raised by the Kent Downs AONB Unit regarding sites located in the AONB;
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding;
- Planning permissions, including the granting of 10 additional pitches on the site in Alkham, and 6 pitches at Strawberry Fields Hay Hill, thereby delivering these draft allocations;
- Further site assessment work, including site visits to sites previously identified in the Gypsy and Traveller site options investigation study (2020);
- The site promoter for the land to the South of Aylesham confirming that the site wasn't available for the delivery of gypsy and traveller pitches.
- 1 pitch at Half Acres, Alkham allowed at appeal, changing the site status from a proposed allocation to an intensification site.

Given this, the need for Gypsy and Traveller pitches is planned to be met by the following:

- Planning permission has been granted for 18 pitches since the GTAA update in 2020, meeting the need for pitches up to 2028.
- Turnover on existing sites - The GTAA identified 10 pitches that were vacant and available for occupation. A survey carried out in August 2021 confirmed that 5 of these previously vacant pitches are now occupied and 5 pitches remain vacant.
- 5 pitches are to be provided through suitable intensification of existing sites, including the one site identified as suitable through the targeted call for sites. These are identified in policy H3 of the Local Plan.
- Windfall sites – The Local Plan enables the Council to determine planning applications for Gypsy and Traveller sites on a site-by-site basis, subject to individual circumstances and need – see Policy H4.

The strategy proposed identifies specific sites to meet 16 years need from 2020, providing for the majority of the plan period need within the short to medium term, with a 5-year supply of sites. All sites identified for intensification are existing gypsy and traveller sites. Policy H3 of the Local Plan sets out a number of considerations for the intensification of the identified gypsy and traveller sites that will need to be addressed as part of the planning process.

## Employment Sites

### Identification and Assessment of Employment Sites

The Housing and Economic Land Availability Assessment (HELAA) also considered sites for economic development uses.

As part of stage 1 of the HELAA process officers compiled a comprehensive list of 43 employment sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in 20 sites being removed.

The remaining 23 sites were then assessed to determine their suitability and development potential based on:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

Sites were then classified as being either: suitable (green), potentially suitable (amber) or unsuitable (red). The findings of the HELAA were then published as part of the Regulation 18 consultation on the draft Local Plan and representations were invited.

A targeted call for sites was also undertaken alongside the consultation on the Regulation 18 draft Local Plan. In total 120 sites were submitted, of which 6 were employment sites and 2 were mixed use including employment. Officers undertook a suitability assessment of these sites based on the HELAA methodology outlined above. In summary, of the 8 sites submitted:

- 3 employment sites as suitable;
- 2 employment sites and 1 mixed use site as potentially suitable; and
- 2 employment sites as unsuitable.

As part of the Regulation 18 consultation, representations were also made on both the proposed employment site allocations identified in the Plan and on existing HELAA sites, not proposed as allocations in the draft Local Plan. The Council's response to these comments is reported in the Local Plan Consultation Statement.

The HELAA has subsequently been updated to take account of:

- Updated technical evidence
- Representations made through the consultation on the Reg 18 Draft Local Plan
- Changes in the planning status of sites.
- Changes in the estimated development potential of sites.
- Further engagement with key stakeholders; and
- Further site assessment work.

The HELAA September 2022 (including the targeted for sites) review concluded that of the 29 sites assessed:

- 21 are suitable
- 7 are potentially suitable
- 1 site (Betteshanger Colliery) now has planning permission for predominantly housing

## Sustainability Appraisal of Employment Sites

Employment site options assessed as being either suitable or potentially suitable in the HELAA have been appraised through the Sustainability Appraisal (29 sites in total).

The Sustainability Appraisal concluded that no single settlement's employment sites perform particularly better than any other and identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA.

## Site Allocation Selection

The HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF. It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development, that is the role of the Local Plan.

In determining the sites to be taken forward as employment allocations in the Local Plan the Council has also therefore had regard to:

- The overarching growth strategy set out in the Local Plan
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan
- The Economic Growth Strategy
- The level of employment need identified in the Economic Development Needs Assessment
- Supply of employment floorspace identified in the AMR
- The development potential of the sites (some sites identified as suitable or potentially suitable are existing employment sites with limited capacity for new floorspace, development would be limited to some intensification or redevelopment).
- The revised settlement hierarchy
- The evidence base that supports the Local Plan; and
- Representations made by key stakeholders and site promoters

## Proposed Regulation 18 Employment Allocations

To deliver the Council's economic growth strategy a number of strategic employment allocations were proposed in the draft Local Plan. These include:

- Whitecliffs Business Park, Whitfield

- Aylesham Development Area, Aylesham
- Sandwich Industrial Estate, Sandwich
- Discovery Park, Sandwich
- Ramsgate Road, Sandwich
- Dover Waterfront

The justification for the inclusion of these sites as proposed employment allocations, and conversely the exclusion of others, was set out in the draft Reg 18 Local Plan Site Selection Topic Paper (Appendix A) that was published to support the Regulation 18 Local Plan.

The proposed employment allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

## Proposed Regulation 19 Employment Allocations

The employment allocations in the Regulation 19 Local Plan have been updated following the Regulation 18 consultation to take into account:

- The updated Economic Development Needs Assessment 2021
- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process.
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites;
- The development potential of the sites (some sites identified as suitable or potentially suitable are existing employment sites with limited capacity for new floorspace, development would be limited to some intensification or redevelopment.
- Further site specific SA work;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding, and LVIA of specific sites.

This has resulted in the following sites being removed as allocations from the Regulation 19 Local Plan:

- Sandwich Industrial Estate – Site was allocated for further intensification. This is now covered by policy E1 and E2.
- Ramsgate Road. Sandwich – Site was allocated for further intensification. This is now covered by policy E1 and E2.

The following sites are existing allocations that have been rolled forward as employment allocations in the Regulation 19 Local Plan:

- White Cliffs Business Park Phases 1, 2 and 3, Whitfield
- Discovery Park, Sandwich
- Aylesham Development Area, Aylesham
- Dover Waterfront

The following sites have been added as new employment allocations in the Regulation 19 Local Plan, following the Targeted Call for Sites undertaken at Regulation 18 and the review of existing HELAA sites based on comments made at Regulation 18.

Site Ref	Address	Settlement	Proposed Use	Reason for Allocation
TC4S076	Statenborough Farm, Eastry	Eastry	B1/B2 and retail	Existing employment site in the rural area, that would be suitable for further employment development to meet the continued demand for rural employment space in the District.
TC4S083	The Citadel, Dover	Dover	Mixed Use	Regeneration of brownfield site to secure the future of this important heritage asset. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. Site covered by the Western Heights SPD.
TC4S092	Fort Burgoyne, Dover	Dover	Mixed Use	Regeneration of this site would secure the future of this important heritage asset. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period.
TC4S120	White Cliffs Business Park Phase 4	Dover		Due to the need for further light industrial floorspace (now covered by Class E(g)(iii)) in the District and the uncertainty regarding the availability and deliverability of part of Phase 2 and Phase 3 of WCBP, it is proposed to identify additional land adjoining White Cliffs Business Park (known as Phase 4) to meet this need and ensure there is choice and flexibility in this location.
AYL005	Former Snowdown Colliery	Aylesham	Mixed Use	The regeneration of this site would secure the future of the heritage asset on the site. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. The development of this site would also support the rural economy.

Sites have been selected for allocation in the Local Plan in accordance with the economic strategy set out in the Local Plan. The intensification of existing employment sites will be supported through Policies E1 and E2 of the Local Plan.

The final list of employment site allocations for the Regulation 19 Local Plan is as follows:

- White Cliffs Business Park Phases 1, 2, 3 and 4, Whitfield
- Discovery Park, Sandwich
- Aylesham Development Area, Aylesham
- Statenborough Farm, Eastry
- Fort Burgoyne, Dover
- The Citadel, Dover
- Dover Waterfront
- The Former Snowdown Colliery, Aylesham

The Regulation 19 Local Plan groups the site allocation policies by settlement to reflect the agreed settlement hierarchy. With the exception of Statenborough Farm Eastry, all the above sites are considered to be strategic site allocations. Discovery Park already benefits from planning permission and therefore isn't covered by a specific site allocation policy.

## Appendices

### Appendix A – The Selection of Site Allocations for the Draft Local Plan (reg 18)

This paper provides the background to the selection of the proposed housing, gypsy and traveller and employment site allocations for the Draft Local Plan, and sets out the reasoning behind the selection of specific site options within the District's Regional, District, Rural Service, Local Centres, Villages and Hamlets.

#### Overarching Growth Strategy

As part of the preparation of the Local Plan the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) process:

- Growth options - range of potential scales of housing and economic growth that could be planned for;
- Spatial options - range of potential locational distributions for the growth options.

By appraising the reasonable alternative options the SA provides an assessment of how different options perform in environmental, social and economic terms, which helps inform which option should be taken forward. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision.

The SA identified and appraised five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations):

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and Economic Land Review).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Plan Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario.

However, given the environmental constraints that exist around Deal and Sandwich very few suitable and potentially suitable sites have been identified in these towns. Given this, the council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing

and economic growth in the District will therefore primarily be based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

Sites have therefore been selected in accordance with the preferred option for the distribution of housing and economic growth, based on their suitability, availability, and achievability.

## Settlement Hierarchy

To support the consideration of the Growth Options through the Sustainability Appraisal process a review of the Settlement Hierarchy was undertaken.

The purpose of the Settlement Hierarchy Study was to identify those settlements in the District that are the most sustainable, based on the range of facilities and services present. It focuses in particular on the rural settlements of the District, given that the sustainability credentials of the district's three main centres of Dover, Deal and Sandwich are well-established.

The NPPF and NPPG require that Local Planning Authorities promote sustainable development in rural areas to support the vitality of their rural communities. New housing can enable rural communities to retain their existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

The continued national policy emphasis on sustainable development means that housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich, with new development in the rural areas limited and focused on villages commensurate with their scale and position in the hierarchy, unless local factors, including flood risk and environmental designations, dictate otherwise. As the Settlement Hierarchy Study and its predecessor have established, Dover District does not possess a large number of larger villages, but rather a large number of small settlements. The Settlement Hierarchy Study indicates that it is therefore appropriate that the distribution of new housing in the rural areas of the district reflects such a settlement pattern.

The Council has used the Settlement Hierarchy Study to inform the proposed site allocations for the Local Plan and determine how much development an individual settlement should accommodate based on its position in the revised Settlement Hierarchy.

## Housing Sites

### Identification and Assessment of Housing Sites

The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The HELAA has been prepared in accordance with the guidance set out in the Government's Planning Practice Guidance <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>



As part of stage 1 of the HELAA process officers compiled a comprehensive list of housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in sites being removed.

The remaining sites were then taken forward for more detailed assessment. The first stage of this process involved a desktop review using GIS to identify any relevant on-site constraints. Following this, sites were then physically surveyed and assessed to determine their suitability and development potential (i.e number of houses that could be delivered on the site) using the following criteria:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

In addition to this, comments were also sought from key stakeholders (including KCC Highways, DDC Heritage Officer, Landscape Architect, Environment Agency and the Kent Downs AONB Unit) with regards to the suitability of some of the sites.

The suitability assessment identified:

- 93 sites as suitable<sup>8</sup>;
- 41 sites as potentially suitable<sup>9</sup>; and
- 197 sites as unsuitable<sup>10</sup>.

The remaining 33 sites gained planning consent during the assessment process and were therefore removed.

The suitable and potentially suitable sites were then subjected to an availability assessment to determine whether the sites were available for development within the plan period. This involved contacting the relevant site owners/promoters to confirm the sites availability for development within the next 15-20 years. The availability assessment revealed:

- 114 sites as available<sup>11</sup>;

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<sup>8</sup> Suitable is defined in the HELAA as: *'site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.'*

<sup>9</sup> Potentially suitable is defined in the HELAA as: *'site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.'*

<sup>10</sup> Unsuitable is defined in the HELAA as: *'site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.'*

<sup>11</sup> Available is defined in the HELAA as: *'landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.'*

- 12 sites as potentially available<sup>12</sup>; and
- 8 sites as unavailable<sup>13</sup>.

Councillors were consulted on the draft findings of the HELAA in 2019, following which a series of meetings were held with Town and Parish Councils in February/March 2020. The draft HELAA was then published on the council's website at the start of April 2020. This concluded that the 126 sites, with a capacity to accommodate 12,111 dwellings, are suitable or potentially suitable and available or potentially available.

The draft HELAA has subsequently been updated to take account of:

- Further evidence requested by officers in relation to highways constraints identified on certain sites;
- New availability evidence;
- Viability evidence in respect of achievability;
- Comments made as part of the wider engagement on the HELAA sites;
- Sites which now have planning permission.

The updated HELAA has been published as part of the Regulation 18 consultation on the draft Local Plan and further representations are invited.

### **Appraisal of Housing Sites**

As part of the Sustainability Appraisal of the draft Local Plan site specific Sustainability Appraisal assessments were carried out on the 126 HELAA sites that were assessed as being suitable or potentially suitable and available or potentially available. In addition to this, a further 8 sites were also subjected to SA alongside the other 126 sites on a precautionary basis. These were sites where the Council had been unable to contact the landowners to confirm their availability before the SA work was carried out.

Each residential site option was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal (see Sustainability Appraisal Report). To ensure that all site options were appraised to the same level of detail in the SA, all options have been appraised at a high level based on the potential capacity of each site using each sites redline boundary and the Council's most up-to-date evidence base.

The Sustainability Appraisal then organised the sites by settlement, with the strongest site options at the top and the weaker performing site options at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects

The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or

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<sup>12</sup> Potentially available is defined in the HELAA as: 'Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.'

<sup>13</sup> Unavailable is defined in the HELAA as: 'The landowner/ site promoter has confirmed that the land is not available for development in the next 15-20 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.'

significantly mitigate the potential significant adverse effects identified through the SA against SA objectives 5 (Air Pollution), 7 and (Flood Risk) and 9 (Biodiversity) through the policies in the draft Plan.

### **Site Selection Process**

The interim HELAA (2020) identified 126 green and amber sites, that would deliver in the region of 12,111 new homes. This is clearly in excess of the amount of land that is needed to meet the residual housing requirement of 5,288 homes over the Plan period (figure doesn't include the Whitfield Urban expansion).

The HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF (2019). It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development, that is the role of the Local Plan.

In determining the sites to be taken forward as housing allocations in the draft Local Plan the Council has also therefore had regard to:

- The overarching growth strategy set out in the draft Local Plan;
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan;
- The revised settlement hierarchy;
- The Whole Plan Viability Study;
- The Air Quality Study; and
- The Local Plan Transport Modelling Work.

### **Proposed Housing Allocations**

The Local Plan allocates sites to deliver 7,511 new homes over the Plan period, of which 3,690 homes are proposed on strategic sites and 3,821 are proposed on non-strategic housing sites. Strategic housing allocations are proposed at:

- Whitfield – The urban expansion of Whitfield is currently identified as a strategic allocation in the Core Strategy 2010 for the delivery of at least 5,750 new homes. Through the Housing and Economic Land Availability Assessment work the Council has also identified an area of land to the north-west of the existing allocation for the delivery of approximately 600 new homes. Strategic Policy 4 allocates this site in addition to the existing allocation at Whitfield for development in accordance with the growth and settlement strategy of the Plan. To date 1,483 homes have been granted consent at Whitfield of which there have been 200 completions, leaving 1,283 homes extant as at 31 March 2020. It is currently estimated that a minimum of a further 2,200 homes can be delivered at Whitfield over the Plan period, with the remainder of the development being delivered outside the Plan period.
- Aylesham – Aylesham is identified as a Rural Service Centre in the settlement hierarchy with the potential to accommodate further growth. Through the Housing and Economic Land Availability Assessment work the Council has identified two sites for development in Aylesham, one to the North of Aylesham for the delivery of approximately 500 new homes and the second to the south of Aylesham for the delivery of approximately 640 new homes. Strategic Policies 5 and 6 allocate these sites for development in accordance with the growth and settlement strategy of the Plan.

- Elvington and Eythorne – As part of the Council's housing growth strategy it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District. Through the Housing and Economic Land Availability Assessment work the Council has identified an area of land between Eythorne and Elvington for the delivery of approximately 350 new homes. Strategic Policy 7 allocates the land to the east of Adelaide Road for development in accordance with the growth and settlement strategy of the Plan

A number of non-strategic allocations are also proposed in Site Allocations Policy 1 in the draft Local Plan.

The justification for the inclusion of these sites as proposed housing allocations in the draft Local Plan, and the exclusion of others, is set out in Appendix A.

Where constraints have been identified on sites, it is considered that these can be mitigated as part of the planning process and the Strategic and Site Allocations policies set out a number of key considerations for each site in relation to highways, access, heritage, landscape, minerals and flooding, that will need to be addressed by the land owner when taking the site forward.

Furthermore, to support the delivery of the Local Plan the council is working with key stakeholders to produce an Infrastructure Delivery Plan. This is an iterative document that sets out the infrastructure required to support the planned development set out within this Plan. As part of the Regulation 18 consultation on the draft Local Plan the council will be engaging with infrastructure providers, on site specific infrastructure requirements. These comments will be used to inform the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be published as part of the Regulation 19 consultation on the Local Plan.

The proposed housing allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, further information will be requested from land owners/ site promoters of the proposed allocations to demonstrate the sites deliverability. Any comments received on site specific matters will be reviewed, and the Plan will then be updated prior to Regulation 19.

## Gypsy and Traveller Sites

### Identification and Assessment of Gypsy and Traveller Sites

The NPPF requires Local Plans to include provision for the needs of Gypsy and Travellers. This is informed by a Gypsy and Traveller Accommodation Assessment which has been carried out for Dover District Council by consultants arc4.

The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arc4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover on existing sites in the district, and 19 potential pitches on existing sites, resulting in a residual need to identify 13 pitches. Three site options were identified for assessment:

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.

The assessment drew on site analysis undertaken by arc4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

The site South of Ash Road was discounted as unsuitable due to the site being located in flood zone 2 and 3, the need for significant highways and water mains connections work and its distance from schools, health and local services.

The land to the south of Alkham Valley Road, Alkham was assessed as being suitable and the land to the North of Snowdown Caravan Site was assessed as being potentially suitable.

## **Appraisal of Gypsy and Traveller Sites**

The two gypsy and traveller site options have been appraised through the Sustainability Appraisal. The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward.

Of the two sites appraised, the Aylesham site option performs better against the SA framework being in a slightly more sustainably accessible location have having less opportunity to adversely affect the local environment.

## **Site Selection Process**

In determining the sites to be taken forward as gypsy and traveller allocations in the draft Local Plan the Council has had regard to:

- The overarching growth strategy;
- The requirement to meet the level of need identified in the Gypsy and Traveller Accommodation Assessment;
- The availability of sites for gypsies and travellers; and
- The suitability of the identified sites for gypsies and travellers.

## **Proposed Gypsy and Traveller Allocations**

The draft Local Plan proposes to meet the identified need for 42 gypsy and traveller pitches in the District over the Plan period in the following way:

- 10 pitches are likely to become available through turnover on existing sites and this will be monitored as part of the Council's yearly Housing Information Audit.
- 9 pitches can be provided through suitable intensification of existing sites (see DM Policy 10).
- Through the allocation of both the site in Alkham and the site in Aylesham for gypsy and traveller pitches.

The land to the south of Alkham Valley Road is allocated in Site Allocations Policy 2 for 10 pitches. This site was selected for allocation as its an established gypsy and traveller site that has planning consent and forms part of the 19 pitches for intensification. The site is considered to be available and deliverable in the short term.

The land to the North of Snowdown Caravan Site is allocated in Strategic Policy 6 South Aylesham for 10 pitches. This site is dependant on being delivered as part of the wider development of this site. It

is in close proximity to an existing KCC run gypsy and traveller site. The site is considered to be available and deliverable in the medium to long term.

Where constraints have been identified on the sites, it is considered that these can be mitigated as part of the planning process and the Strategic and Site Allocations policies set out a number of key considerations for each site that will need to be addressed by the land owner when taking the site forward.

The proposed gypsy and traveller allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, a call for sites will be carried out with the aim of identifying additional land that could deliver the 3 pitches required to meet the level of identified need and to provide a wider range of options for potential site allocations.

## Employment Sites

### Identification and Assessment of Employment Sites

The Housing and Economic Land Availability Assessment (HELAA) also considered sites for economic development uses.

As part of stage 1 of the HELAA process officers compiled a comprehensive list of 43 housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in 20 sites being removed.

The remaining 23 sites were then assessed to determine their suitability and development potential based on:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

Sites were then classified as being either: suitable (green), potentially suitable (amber) or unsuitable (red).

The updated HELAA has been published as part of the Regulation 18 consultation on the draft Local Plan and further representations are invited.

### Appraisal of Employment Sites

As part of the Sustainability Appraisal of the draft Local Plan site specific Sustainability Appraisal assessments were carried out on the 23 employment sites identified in the HELAA.

The Sustainability Appraisal concluded that no single settlement's employment sites perform particularly better than any other and identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA.

## **Site Selection Process**

The Council's Economic Growth Strategy supports the delivery of a higher level of economic growth in the District. However, until the Economic Development Needs Assessment has been updated, post Regulation 18, there is uncertainty around the level of jobs growth anticipated over the Plan period and the amount of new employment land that will be required to deliver this.

Furthermore, there is uncertainty around the future availability of White Cliffs Business Park for general employment purposes. It is unclear at this stage exactly what will remain available for employment purposes, but it is likely that at least in medium term and potentially long term, only a small part of the site will remain available for employment use.

The Council is also aware that growth of employment related to Discovery park may not be able to be accommodated within the existing site and further land may be required to support this growth.

Given this, whilst there is still some remaining development potential on existing allocations, which can be rolled forward into the new draft Local Plan, options for allocating further land for employment development are currently limited and further land is therefore likely to be required to deliver the Council's Economic Strategy.

## **Proposed Employment Allocations**

To deliver the Council's economic growth strategy a number of strategic employment allocations are proposed in Strategic Policy 9 of the draft Local Plan. These include:

- Whitecliffs Business Park, Whitfield
- Aylesham Development Area, Aylesham
- Sandwich Industrial Estate, Sandwich
- Discovery Park, Sandwich
- Ramsgate Road, Sandwich
- Dover Waterfront

The justification for the inclusion of these sites as proposed employment allocations in the draft Local Plan, and the exclusion of others, is set out in Appendix 2.

The proposed employment allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council will also be carrying out a call for employment sites as part of the Regulation 18 consultation on the Local Plan. Any comments received on site specific matters will be reviewed, and the Plan will then be updated prior to Regulation 19.

## Appendix 1: Reasons for the selection of the proposed housing allocations for the draft Local Plan by settlement

### Alkham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
ALK003	Land at Short Lane, Alkham	0.32	10	Medium	Site in AONB and KCC Minerals area. Existing tree's should be retained and a landscape buffer is required.	<p>Alkham is a large village, where development would be acceptable in principle in or adjoining the settlement.</p> <p><b>ALK003</b> is the only suitable site identified in Alkham through the HELAA, and is therefore proposed as an allocation, in line with the Council's growth strategy.</p> <p>A number of key considerations have been identified in relation to this site and these will need to be addressed by the land owner as part of the planning process.</p> <p>Where the SA has identified significant adverse effects in relation to this site there is considered to be sufficient scope to avoid or significantly mitigate these.</p>



Ash

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
ASH003	Land south of Mill Field, Ash	0.40	8	Medium	Archaeological Assessment required. A landscape buffer is required.	<p>Ash is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.</p> <p><b>ASH003, ASH004, ASH010, ASH011, ASH014</b> and <b>ASH015</b> are proposed as allocations, in line with the Council's growth strategy. ASH010 has also recently been granted planning permission. Any further allocations in Ash were not considered to be in accordance with the settlement hierarchy and would not lead to sustainable development.</p> <p>ASH005 and ASH008 have been discounted as relative to the other reasonable options they were not considered to be as well related to the existing settlement of Ash. ASH008 also performs poorly in the SA of the sites.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Ash and these will need to be addressed by the relevant land owners as part of the planning process.</p>
ASH004	Land to the north of Molland Lane, Ash	4.48	110	Long	Transport Assessment and Heritage Assessment required. A landscape buffer is required. Vehicular access to be provided from Chequer Lane.	
ASH010	Land adjacent to Saunders Lane, Ash	3.40	76	Short	Heritage Assessment required. A tree survey would be required and existing trees should be retained where possible.	
ASH011	Guilton, Ash	0.35	10	Medium	Heritage Assessment and Land contamination assessment required. A landscape buffer is required.	
ASH014	Land to the south of Sandwich Road, Ash	3.34	63	Short	Heritage Assessment and Land Contamination Assessment required. Vehicular access from Sandwich Road. No vehicular access from Cherry garden lane. Existing boundary hedgerows and vegetation to be retained and enhanced.	
ASH015	Former Council Yard, Molland Lea, Ash	0.16	5	Medium	Land Contamination Assessment required.	

						<p>Furthermore, where the SA has identified significant adverse effects in relation to ASH004 and ASH010 there is considered to be sufficient scope to avoid or significantly mitigate these.</p> <p>A Neighbourhood Plan is currently being prepared for Ash. The sites proposed as allocations in the Local Plan are the same as those identified in the draft Ash Neighbourhood Plan, with the exception of ASH010, which has recently been granted planning permission.</p>
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#### Aylesham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
AYL001	Land at Dorman Avenue, Aylesham	0.31	9	Medium	Archaeological Assessment required.	Aylesham is a rural service centre and suitable for a scale of development that would reinforce its role as a provider of services to the rural area.
AYL002	Land at the Boulevard, Aylesham	0.61	17	Medium	Archaeological Assessment required.	
AYL003	Land to the South of Spinney Lane Aylesham	132.22	640	Medium	Transport Assessment and Archaeological Assessment required. Ancient woodland will need to be protected. Landscape buffer required to the south and west of the site.	<b>AYL003</b> and <b>AYL004</b> have been identified as strategic sites in the Local Plan to deliver the council's housing growth strategy. Whilst constraints do exist on these sites, primarily in relation to highways, work is on-going to address this and develop an appropriate mitigation scheme.
AYL004	Land to the North of Aylesham	36.35	500	Medium	Transport Assessment and Archaeological Assessment required.	

					<p>Landscape buffer required to the west of the site.</p>	<p><b>AYL001</b> and <b>AYL002</b> are small sites within the existing settlement of Aylesham and are considered suitable for development in accordance with the housing growth strategy.</p> <p>AYL005 is not proposed as an allocation at this stage. This site has been put forward to enable the development of the larger adjacent site for employment uses. It is considered that this could come forward separately outside of the Local Plan. The site is also a Local Wildlife site and has a number of constraints that would need to be mitigated.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Aylesham and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Where the SA has identified significant adverse effects in relation to these sites there is considered to be sufficient scope to avoid or significantly mitigate these.</p>
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## Capel-le-Ferne

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	4.02	50	Short	Transport Assessment and Archaeological Assessment required. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed. Vehicular access to be provided from Capel Street. A landscape buffer is required between the site and the AONB to the NW. Development should be set back from the existing residential properties.	Capel-le-Ferne is a large village where development would be acceptable in principle in or adjoining the settlement. All the suitable and potentially suitable HELAA sites identified in Capel are proposed as allocations in the Local Plan, in accordance with the Council's growth strategy ( <b>CAP006, CAP009, CAP011 and CAP013</b> ).
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	0.66	10	Medium	Archaeological Assessment required. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed. A landscape buffer is required to mitigate impact on the adjacent AONB.	A number of key considerations have been identified in relation to the proposed site allocations in Capel le Ferne and these will need to be addressed by the relevant land owners as part of the planning process.
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	0.57	18	Medium	Site in AONB. Existing trees and hedgerow should be retained wherever possible and a generous landscape buffer will be required. Archaeological Assessment required.	With regards to CAP006, due to highways concerns the estimated dwelling number on this site has been halved, and the size of the allocation has been reduced to reflect this.
CAP013	Land at Cauldham Lane, Capel-le-Ferne	0.76	15	Medium	Archaeological Assessment required. Landscape buffer required to mitigate impact on the adjacent AONB. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on these sites

## Deal Area

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
<b>Deal</b>						
DEA008	Land off Cross Road, Deal	8.73	100	Medium	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. A landscape buffer is required. Cumulative highways impact to be addressed.	Deal (incorporating Sholden, Great Mongeham and Walmer) is identified as a District Centre in the settlement hierarchy and should be the secondary focus for development in the District.  Given this, all the suitable and potentially suitable HELAA sites identified in the Deal area are proposed as housing allocations ( <b>DEA008, DEA018, DEA020, DEA021, SHO002, SHO004, GTM003 and WAL002</b> ). This is because these site options are compatible with the Council's preferred housing growth strategy and can make notable contributions to delivery of District's housing needs of the Plan period over the short, medium and long term.  A number of key considerations have been identified in relation to the proposed site allocations in the Deal area and these will need to be addressed by the relevant land owners as part of the planning process.
DEA018	Church Lane/Hyton Drive, Deal	0.48	18	Short	Archaeological Assessment required. KCC minerals area.	
DEA020	Land off Cross Road, Deal	4	100	Medium	Transport Assessment and Archaeological Assessment required. A landscape buffer is required. Cumulative highways impact to be addressed.	
DEA021	Land off Freeman's Way, Deal	3.69	88	Short	Archaeological Assessment and Land Contamination Assessment required. Site is open space.	
<b>Sholden</b>						
SHO002	Land at South West of Sandwich Road, Sholden, Deal	5.26	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. A generous landscaping scheme and landscape buffer is required.	
SHO004	Land adjoining Pegasus, Sandwich Road, Sholden	1.21	42	Short	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed.	

					A generous landscaping scheme and landscape buffer is required.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on DEA008, DEA020, DEA021, SHO002, SHO004 and WAL002.	
<b>Great Mongeham</b>							
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10	Medium	Heritage Assessment required. A generous landscaping scheme is required.		
<b>Walmer</b>							
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	4.44	100	Medium	Transport Assessment and Archaeological Assessment required. Cumulative impact on the road network to be addressed. A landscape buffer will be required.		

#### Dover Area

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
<b>Dover</b>						
DOV006	Land at Dundedin Drive, Dover	0.37	8	Medium	Archaeological Assessment required. Existing trees should be retained where possible.	Dover is a secondary regional centre and therefore the major focus for development in the District. This is reflected in the level of growth proposed here.  The urban expansion of Whitfield ( <b>WHI008</b> ), and the proposed northern extension to the site ( <b>WHI001</b> ), is identified as a strategic housing allocation in the draft Plan (rolled forward from the existing Core Strategy 2010) and will continue to be the focus of housing growth in the District. WHI008 is also subject to a number of
DOV008	Land adjoining 455 Folkestone Road, Dover	0.34	5	Short	Site in AONB. A landscape buffer is required to mitigate any impact on the AONB.	
DOV009	Land at Stanhope Road, Dover	0.82	32	Short	Archaeological Assessment required.	
DOV012	Former Channel Tunnel Workers Accommodation, Farthingloe, Dover	11.62	100	Medium	Heritage Assessment and Land Contamination Assessment required Site in AONB and KCC Minerals area. A comprehensive landscaping scheme and landscape buffer will be required to mitigate impact on the landscape.	

DOV017	Dover Waterfront	10.98	200	Long	Heritage Assessment required. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment and Transport Assessment required. An assessment of air quality, noise, vibration and light pollution will also be needed.	<p>planning permissions to take this site forward.</p> <p>Furthermore, it is proposed to continue with the regeneration of key sites in the Town Centre including Dover Waterfront (<b>DOV017</b>) and Mid Town (<b>DOV018</b>) (both currently allocated for development in the Council's Core Strategy 2010), and these are rolled forward as allocations for mixed use development including housing in the draft Local Plan.</p> <p>Unless sites are now unavailable the majority of the suitable and potentially suitable sites identified in the HELAA in the Dover area are proposed as allocations (i.e <b>DOV006, DOV008, DOV009, DOV012, DOV019, DOV022B, DOV022C, DOV022E, DOV023, DOV025, DOV026, DOV028, DOV030, GUS002</b> and <b>WHI006</b>). This is because these site options are compatible with the Council's preferred housing growth strategy and can make notable contributions to delivery of District's housing needs of the Plan period over the short, medium and long term. DOV009 and part of DOV022C have also now been granted planning permission.</p> <p>Sites confirmed as unavailable include DOV010, DOV021, DOV022A, DOV029 and DOV035.</p>
DOV018	Dover Mid Town	5.99	100	Medium	Heritage Assessment required. Development should be set back from the River Dour. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment and Transport Assessment required.	
DOV019	Albany Place Car Park, Dover	0.28	15	Medium	Heritage Assessment required.	
DOV022B	Land adjacent to the Gas Holder, Coombe Valley, Dover	0.91	40	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV022C	Land between Coombe Valley Rd and Primrose Rd, Dover	0.37	20	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV022E	Land at Barwick Rd Industrial Estate, Coombe Valley, Dover	3.69	220	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV023	Buckland Paper Mill, Dover	2.38	124	Short	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required.	

					Land Contamination Assessment required. KCC Minerals area.	The Council are also now pursuing DOV007 and DOV032 for employment/tourism use. This area has therefore been identified as an opportunity area in the Dover Town Centre policy.  A number of key considerations have been identified in relation to the proposed site allocations in the Dover and these will need to be addressed by the relevant land owners as part of the planning process.  Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites in Dover.
DOV025	Land off Wycherley Crescent, Dover	0.54	10	Medium	Site is covered by two Local Wildlife sites - mitigation will therefore be required.	
DOV026	Westmount College, Folkestone Road, Dover	1.43	100	Medium	Land Contamination Assessment required. Existing trees should be retained where possible, and screening should be provided at the boundary. Better links should be provided through the site to connect with the public open space to the north.	
DOV028	Charlton Shopping Centre, High Street, Dover	0.63	100	Medium	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment required. Site in a KCC Minerals area.	
DOV030	Land at Durham Hill, Dover	0.34	10	Short	Heritage Assessment and Land Contamination Assessment required. Site is open space.	
<b>Guston</b>						
GUS002	Connaughts Barracks, Dover	54.98	300	Short	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. A landscaping scheme is required to mitigate impact on the views of and from nearby heritage assets.	
<b>Whitfield</b>						



WHI006	Guide Hut, Sandwich Road, Whitfield	0.24	8	Medium	Existing trees and hedgerow should be retained where possible.
WHI008/ WHI001	Whitfield Urban Extension (including proposed northern extension)	380	2200 (in Plan period)	Long	Development should be in accordance with SPD. Transport Assessment and Heritage Assessment required. A generous landscaping scheme is required to mitigate impact on the countryside.

### Eastry

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
EAS002	Land at Buttsole Pond, Lower Street, Eastry	3.93	80	Medium	Transport Assessment and Heritage Assessment required. A generous landscaping scheme and landscape buffer will be required to mitigate impact on the countryside.	Eastry is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.
EAS009	Eastry Court Farm, Eastry	0.84	5	Medium	Transport Assessment and Heritage Assessment required. Existing trees should be retained where possible.	With the exception of EAS007 and EAS011 it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in Eastry in accordance with the Council's growth strategy (i.e <b>EAS002</b> , <b>EAS009</b> , and <b>EAS012</b> ).
EAS012	Lower Gore Field, Lower Gore Lane, Eastry	3.97	35	Long	Transport Assessment and Archaeological Assessment required. Site in a KCC Minerals area. A significant landscape buffer will be required along the north west boundary of the site. This area should remain undeveloped.	EAS007 is detached from the settlement and is proposed primarily for employment, therefore it is not proposed to allocate this site for housing.

						<p>Part of EAS011 has now been granted planning permission and the remainder of the site is unavailable.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Eastry and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites in Eastry.</p>
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### Eythorne and Elvington

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
EYT001	Land at Monkton Court Lane	1.94	20	Medium	Transport Assessment, Heritage Assessment and Archaeological Assessment required. A landscape buffer will be required.	Eythorne and Elvington are currently identified as villages in Policy CP1 of the Core Strategy (2010). However the recent Settlement Hierarchy Review conducted by the Council shows that both these settlements score well in relation to the number of services and facilities provided. Given this, as part of the Council's strategy for the rural area it is proposed to grow the villages of
EYT003/ EYT009/ EYT012	Land to the east of Adelaide Rd, Elvington	20.26	350	Medium/Long	Site to be masterplanned as a whole. Transport Assessment and Archaeological Assessment required. Protection and enhancement of Ancient Woodland on-site A generous landscaping scheme and landscape buffer is required.	

EYT008	Land on the south eastern side of Roman Way, Elvington	1.65	50	Short	<p>Transport Assessment and Archaeological Assessment required. Cumulative impact on the highway to be addressed.</p> <p>Existing trees and hedgerow should be retained where possible and a generous landscaping scheme should be provided.</p>	<p>Eythorne and Elvington to create a new local centre in the District.</p> <p><b>EYT003, EYT009 and EYT012</b> are therefore identified as a strategic allocation in the Local Plan in accordance with the Council's housing growth strategy.</p>
EYT019	Land to east of Adelaide Road, Eythorne	0.27	6	Medium	<p>Archaeological Assessment required Site in a KCC Minerals area. A landscape buffer is required.</p>	<p><b>EYT001, EYT008 and EYT019</b> have also been identified as suitable sites in the HELAA that would provide a logical extension to the existing settlement and are also proposed as housing allocations in line with the housing growth strategy.</p> <p>It was however considered that any further allocations here would not be consistent with the position of Eythorne and Elvington in the settlement hierarchy, could cause an unacceptable impact on the highway network and would not lead to sustainable development. Given this it is not proposed to allocate EYT002, EYT004 and EYT015.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Eythorne and Elvington and these will need to be addressed by the relevant land owners as part of the planning process.</p>

						Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.
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### Goodnestone and Chillenden

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
G00006	Land adjacent to Short Street, Chillenden	1.02	5	Medium	Heritage Assessment and Land Contamination Assessment required. Suitable for executive homes. A generous landscaping scheme is required.	<p>Chillenden is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate both the sites identified as suitable and potentially suitable in Chillenden would be in conflict with the settlements position in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that <b>G00006</b> was best related to the settlement, and less constrained than G00007. G00007 was therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these</p>

						<p>will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>
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### Kingsdown

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	3.46	90	Short	<p>Transport Assessment, Archaeological Assessment and Land Contamination Assessment required.</p> <p>A generous landscaping scheme is required to mitigate impact on the adjacent AONB.</p>	<p>Kingsdown is a large village where development would be acceptable in principle in or adjoining the settlement.</p> <p><b>KIN002</b> is the only site identified in the HELAA in Kingsdown as being potentially suitable for development and is proposed as a housing allocation due to the fact its in a relatively sustainable location that is compatible with the council's preferred spatial strategy.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p>

**East Langdon**

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	4.68	40	Medium	<p>Transport Assessment and Archaeological Assessment required. Impact on local rural road network to be addressed.</p> <p>A generous landscaping scheme is required to mitigate impact on the countryside.</p>	<p>East Langdon is a large village where development would be acceptable in principle in or adjoining the settlement.</p> <p><b>LAN003</b> is the only suitable site identified in the HELAA in East Langdon. It is therefore proposed as a housing allocation in accordance with the Council’s growth strategy.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

**Lydden**

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	2.18	65	Medium	<p>Transport Assessment and Heritage Assessment required.</p> <p>Impact on Canterbury Rd/ Church lane junction to be addressed.</p> <p>Existing trees and hedgerow should be retained where possible and a generous landscaping scheme is required to mitigate impact on the countryside.</p>	<p>Lydden is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p><b>LYD003</b> is identified as suitable in the HELAA and is proposed as an allocation in accordance with the Council's growth strategy.</p> <p>LYD003 is considered to be better related to the settlement and less constrained than LYD001. LYD001 was therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Nonnington

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	1.14	35	Medium	Heritage Assessment and Land Contamination Assessment required. Existing boundary screening should be retained and enhanced.	<p>Nonington is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>On this basis it was considered that it was only appropriate to continue with the existing undeveloped Land Allocations Local Plan allocation (<b>NON006</b>), and that to allocate further sites would not be sustainable in this location. NON004 and NON009 were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Northbourne



Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
NOR005	Betteshanger Colliery, Betteshanger, Deal	20.69	210	Short	<p>Heritage Assessment, Transport Assessment and Land Contamination Assessment required.</p> <p>Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required.</p> <p>Site in a KCC Minerals area.</p> <p>Existing boundary screening should be retained and enhanced to provide a generous landscape buffer.</p>	<p>Northbourne is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p>To allocate all the sites identified as suitable or potentially suitable in the HELAA in Northbourne would be in conflict with the settlement hierarchy and would not lead to sustainable development.</p> <p>Given this it was considered that <b>NOR005</b> was best related to the settlement, is already supported by existing infrastructure and would deliver the most benefit to the existing community. NOR001, NOR002 and NOR003 were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Preston

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
PRE003	Apple Tree Farm, Stourmouth Road	0.76	12	Medium	Transport Assessment required.	<p>Preston is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p><b>PRE003, PRE016 and PRE017</b> are identified as suitable sites in the HELAA and are proposed as allocations in accordance with the Council's growth strategy.</p> <p>These sites are considered to be better related and connected to the settlement and less constrained than PRE001 and PRE007. PRE007 is also now unavailable.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Preston and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>
PRE016	Site north of Discovery Drive, Preston	1.10	35	Medium	Transport Assessment and Land Contamination Assessment required. Site borders Flood Zone 3. Access to be provided through adjacent sites.	
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	2.53	75	Medium	Transport Assessment and Land Contamination Assessment required. Access to be provided through adjacent sites.	

Ringwold

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
RIN004	Ringwould Alpines, Dover Road, Ringwould	0.22	5	Short	Archaeological Assessment required. Existing trees and hedgerows should be retained and enhanced.	<p>Ringwould is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate all the sites identified as suitable in Ringwould would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that <b>RIN004</b> was the least constrained of the sites and the best related to the settlement, compared to RIN002 and RIN003. These sites were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Sandwich

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	2.10	32	Medium	<p>Transport Assessment, Heritage Assessment and Land Contamination Assessment required.</p> <p>Cumulative highways impact to be addressed.</p> <p>Site in Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p>	<p>Sandwich is a rural service centre and suitable for a scale of development that would reinforce its role as a provider of services to the rural area.</p> <p>With the exception of SAN010 and SAN016 all the suitable and potentially suitable sites identified in the HELAA in Sandwich are proposed as allocations (i.e. <b>SAN006, SAN007, SAN008, SAN013, SAN015, SAN019 and SAN023</b>). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term. SAN015 has also recently been granted planning permission.</p>
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	1.58	80	Medium	<p>Transport Assessment and Heritage Assessment required.</p> <p>Cumulative highways impact to be addressed</p> <p>Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p> <p>Existing screening should be retained and enhanced.</p>	<p>SAN010 has been discounted on the basis that it is poorly related to the settlement, could give rise to an unacceptable impact on the highways network and development here would prejudice any future development of SAN024 if it were to become available.</p>
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.7	35	Medium	<p>Transport Assessment, Heritage Assessment and Land Contamination Assessment required.</p> <p>Cumulative highways impact to be addressed</p> <p>Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p>	<p>SAN010 has been discounted on the basis that it is poorly related to the settlement, could give rise to an unacceptable impact on the highways network and development here would prejudice any future development of SAN024 if it were to become available.</p>

SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	3.43	60	Medium	Site allocated for housing and the expansion of the Sandwich Sports and Leisure Centre Transport and Heritage Assessment required. Cumulative highways impact to be addressed Existing screening should be retained and enhanced.	SAN016 has been discounted on the basis that it is poorly related to the settlement and could give rise to an unacceptable impact on the highways network.  SAN010 and SAN016 also score poorly in the SA of the sites.
SAN015	Kumor Nursery, Sandwich	2.40	67	Short	Transport Assessment required. Cumulative highways impact to be addressed KCC Minerals area.	A number of key considerations have been identified in relation to the proposed site allocations in Sandwich and these will need to be addressed by the relevant land owners as part of the planning process.
SAN019	Sydney Nursery, Dover Road, Sandwich	0.38	10	Medium	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	2.19	40	Medium	Transport Assessment and Heritage Assessment required. Cumulative highways impact to be addressed Site in Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required. Existing boundary screening should be retained and enhanced.	

Shepherdswell

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
SHE003	Land to the north of Westcourt Lane, Shepherds well	9.55	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative impact on the local rural road network to be addressed A comprehensive landscaping scheme will be required to mitigate impact.	Shepherds well is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.  Given this it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in Shepherds well (i.e <b>SHE003</b> , <b>SHE004</b> , <b>SHE006</b> and <b>SHE008</b> ). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term
SHE004	Land to the north and east of St Andrew's Gardens, Shepherds well	4.31	40	Short	Transport Assessment and Archaeological Assessment required. Cumulative impact on the local rural road network to be addressed A sensitive landscaping scheme will be required.	
SHE006	Land at Botolph Street Farm, Shepherds well	0.82	20	Medium	Heritage Assessment required. A landscape buffer is required. Cumulative impact on the local rural road network to be addressed	
SHE008	Land off Mill Lane, Shepherds well	0.38	10	Medium	Archaeological Assessment required. Cumulative impact on the local rural road network to be addressed	SHE001 is unavailable.  A number of key considerations have been identified in relation to the proposed site allocations in Shepherds well and these will need to be addressed by the relevant land owners as part of the planning process.  Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects

						identified through the SA on the sites here.
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**Staple**

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
STA004	Land at Durlock Road, Staple	0.24	3	Short	Heritage Assessment required. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.	<p>Staple is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate all the sites identified as suitable/potentially suitable in the HELAA in Staple would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that <b>STA004</b> was the least constrained of the sites and the best related to the settlement compared to STA003, STA008 and STA010. STA009 has recently been granted planning permission.</p> <p>STA003, STA008 and STA010 were therefore discounted on the basis that they are poorly related to the settlement and would not lead to sustainable development.</p>

						<p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>
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### St Margaret's

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	1.78	40	Short	Part of the site lies within the AONB and Heritage Coast. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Transport Assessment and Land Contamination Assessment required.	St Margaret's is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.
STM006	Land at New Townsend Farm, Station Road, St Margarets	1.32	10	Medium	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Archaeological Assessment required. Suitable for executive homes.	Given this it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in St Margaret's (i.e <b>STM003</b> , <b>STM006</b> , <b>STM007</b> and <b>STM008</b> ). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B)	0.63	18	Short	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact.	



					Existing trees and hedgerow should be retained where possible. Transport Assessment and Heritage Assessment required.	the Plan period over the short, medium and long term STM010 and STM011 are unavailable.
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)	0.63	18	Short	Site is partly in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Existing trees and hedgerow should be retained where possible. Transport Assessment and Heritage Assessment required.	A number of key considerations have been identified in relation to the proposed site allocations in St Margaret's and these will need to be addressed by the relevant land owners as part of the planning process.  Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.

### Wingham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WIN003	Land adjacent to Staple Road	0.83	20	Short	Transport Assessment required. Cumulative impact on the road network to be addressed including Adisham Rd/ Staple Rd and Adisham Rd/A257 junction KCC Minerals area.	Wingham is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.  Given this, with the exception of WIN006, it is proposed to allocate all the suitable sites identified in the HELAA in Wingham (i.e <b>WIN003</b> ,
WIN004	Land adjacent to White Lodge, Preston Hill	0.31	8	Short	Heritage Assessment and Land Contamination Assessment required. A landscape buffer is required.	

WIN014	Footpath Field, Staple Road, Wingham,	3.60	50	Short	<p>Transport Assessment required. Site in a KCC Minerals area. Cumulative impact on the road network to be addressed including Adisham Rd/ Staple Rd and Adisham Rd/A257 junction A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact.</p>	<p><b>WIN004 and WIN014</b>). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term</p> <p>WIN006 has been discounted as it was refused planning permission on highway grounds and it is considered at this stage that this cannot be mitigated.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Wingham and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>
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#### Woodnesborough

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WOO005	Beacon Lane Nursery, Beacon	0.73	5	Short	Archaeological Assessment required. Site in KCC minerals area	Woodnesborough is identified in the small villages and hamlets category in

	Lane, Woodnesborough					the settlement hierarchy where windfall infill development would be acceptable in principle.
WOO006	Land south of Sandwich Road, Woodnesborough	1.27	10	Short	Archaeological Assessment required. Existing trees and hedgerow should be retained where possible.	<p>To allocate all the sites identified as suitable in the HELAA in Woodnesborough would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that <b>WOO005</b> and <b>WOO006</b> were the least constrained sites that were better related to the settlement. Furthermore, WOO007 is unavailable and WOO002 is considered to be too small for allocation.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Woodnesborough and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>

Worth

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WOR006	Land to the east of Jubilee Road	0.56	10	Medium	Heritage Assessment required. Site adjacent to Flood zones 2 and 3. Site in a KCC Minerals area. A landscape buffer will be required.	Worth is a large village where development would be acceptable in principle in or adjoining the settlement
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	0.83	20	Short	Heritage Assessment required. Existing boundary treatment should be retained and enhanced.	<p><b>WOR006</b> and <b>WOR009</b> are identified as suitable sites in the HELAA and are proposed as allocations in accordance with the Council's growth strategy. As it is considered that these sites are best related to the settlement and the least constrained.</p> <p>WOR007 has been discounted on balance given its open space designation in the Worth Neighbourhood Plan.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Worth and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>

## Note

There are no proposed housing site allocations in the settlements of Ripple, Sutton, Tilmanstone and West Hougham.

In Ripple, no suitable or potentially suitable sites were identified here in the HELAA.

In Sutton, SUT005 and SUT007 have been granted planning permission. SUT009 is also now unavailable, which would prevent the development of SUT002 as this site is detached from the settlement and development here would not be well related to the settlement and would lead to unsustainable development.

Tilmanstone and West Hougham fall within the small villages and hamlets category in the settlement hierarchy and as a result of this it was considered that further development would not be appropriate here. Til001 and HOU004 were therefore discounted.

## List of discounted sites

- ASH005
- ASH018
- AYL005
- DOV007
- DOV010
- DOV021
- DOV022A
- DOV029
- DOV032
- DOV035
- EAS007
- EAS011
- EYT002
- EYT004
- EYT015
- GOO007
- HOU004
- LYD001
- NON004
- NON009
- NOR001

- NOR002
- NOR003
- PRE001
- PRE007
- RIN002
- RIN003
- SAN010
- SAN016
- SHE001
- STA003
- STA008
- STA009
- STA010
- STM010
- STM011
- SUT002
- SUT005
- SUT007
- SUT009
- TIL001
- WIN006
- WOO002
- WOO007
- WOR007

## Appendix 2 : Reasons for the selection of the proposed employment allocations for the draft Local Plan

ELR Site Ref Number	Site Name	Location	Site size (ha)	Existing Use	Estimated Development Potential	Reason for Allocation	Reason not taken forward for allocation
1	Ramsgate Road, Sandwich	Sandwich	81.6	Industrial area (Allocated B1/B2/B8 uses)	0 sqm	Industrial site. Needs to be protected. No current remaining developable land, but suitable for redevelopment/ intensification to provide further employment uses. Potential to support future expansion/spill-over of the Enterprise Zone over the longer term. Allocated for potential future development as well as protecting existing employment uses.	
2	Discovery Park Enterprise Zone, Sandwich	Sandwich	81.1	Enterprise Zone - LDO to help guide B class development	0 sqm	The premier employment site in the District with international links. Scope for redevelopment of site to accommodate a greater critical mass of activity in future. Excellent transport connections to road network, cycle route, walking distance into Sandwich town and local services. Allocated for potential future development as well as protecting existing employment uses.	
3	Sandwich Industrial Estate	Sandwich	18.3	Industrial area	5,832 sqm	Suitable for redevelopment/ intensification to provide further employment uses. Part of the site has consent for residential, which has been implemented. One plot remains undeveloped. This had consent for 5,832 sqm B8 use industrial units, however this permission has expired (11/00417). Good transport connections, close to Sandwich for local services. Allocated for potential future development as well as existing employment uses.	
4	Aylesham Development Area	Aylesham	4.2	Allocated B1/B2 uses	8,500sqm	Previous allocation. Employment site with land remaining for development. Adjacent site has been identified as being potentially suitable for housing through the HELAA. Close proximity to Aylesham train station. Connections to A2 by road network, but not good access for HGV movements. The demand for some employment land may increase from new housing units, in	

						order to improve sustainability. Site hasn't come forward since 2002 allocation. Suitable site for mixed use, B1 and potentially some B2 due to close proximity to residential. Keep as an employment allocation.	
5	Pike Road Industrial Estate, Eythorne (aka Tilmanstone Employment Site)	Eythorne	9.3	Allocated B2 use	0 sqm		Previously allocated industrial site. Site has permission for 10,000 sqm B2 floorspace and a solar farm (13/00654). Permission is yet to be implemented. The relatively isolated site supports a mix of occupiers, although question whether sufficient demand exists in the local market for this scale of space in this location. Good access to A256 on road network. Fairly isolated site with limited access to local services. Protect employment uses, but not to be strategic allocation.
6	Betteshanger Colliery Pithead	Betteshanger	6.9	Allocated (B1/B2/B8 uses)	2,500sqm		Long-standing employment allocation that has remained undeveloped for a number of years. Site is identified in the HELAA for housing/ mixed use development. Currently subject to a planning application for mixed use re-development including 2,500 sqm B1 floorspace. Suitable for employment uses, but would be suitable for more flexible or mixed uses moving forward in the plan period. Site not to be allocated for employment. Site is allocated for housing.
7	White Cliffs Business Park Phases I-III	Dover	54.7	Allocated B1/B2/B8 uses	Phase 1 - 2,905 sqm Phase 2 - 34,076 sqm Phase 3 - 50,400 sqm	Existing allocation. Premier employment site in the District. Need to protect from further erosion of employment uses. Undeveloped plots remain. Keep as an employment allocation.	
8	Barwick Road Industrial Estate	Dover	20.06	Industrial	0 sqm		Industrial site. Needs to be protected. Suitable for redevelopment/ intensification to provide employment uses, but constrained by its location and access difficulties. Part of the site is currently



							allocated for residential and had permission granted for 220 residential units (12/00111) although this has now lapsed. This part of the site would lend itself to more mixed use development. Protect employment uses, but not to be strategic allocation.
9	Dover Western Docks	Dover	38.53	Port Related	375 sqm		Port related site, covered by a harbour revision order, with the potential to provide an element of employment as part of its future expansion plans. Capacity exists within the site to provide further port related employment uses in the future. Not to be a wider employment strategic allocation.
10	Deal Business Park	Deal	2.4	B1 and B2	0 sqm		Suitable for redevelopment/ intensification to provide employment uses. Part of the site now forms part of the Albert Road mixed use development. Road network constraints. Protect employment uses, but not to be strategic allocation.
11	Albert Road, Deal	Deal	1.8	Brownfield - Site cleared for development	0 sqm		Existing allocation. Site has permission for mixed use development including 960 sqm B1 office space. Provided this is built out no further potential remains. Site would be unsuitable for regular HGV movements given the road network constraints. Protect employment uses, but not to be strategic allocation.
12	Whitfield Urban Extension, (land to east of Sandwich Road and north west of Napchester Road)	Whitfield	310	Greenfield	750 sqm		Existing allocation. Site is identified as a strategic allocation in the draft Local Plan to provide an urban extension to Whitfield. The development is identified to provide 750 sqm B1 floorspace, however there maybe potential to increase this amount if justified. The site is identified for allocation through the housing policies, so not necessary to duplicate within the strategic employment allocations.

13	The Worth Centre, 1 Jubilee Road, Worth	Worth	0.77	Industrial. B1 and B8.	0 sqm		Small scale rural industrial site. Employment allocation in the Worth Neighbourhood Plan. The unit sizes are appropriate in size for smaller local businesses. Potential for some redevelopment/ intensification. Protect employment uses, but not to be strategic allocation.
14	Land off Holt Street, Snowdown, Aylesham	Aylesham	39.94	Vacant/former colliery land	25,000 sqm		Site promoted in the HELAA for a range of employment uses. Provided constraints can be mitigated, site is potentially suitable for employment. KCC have expressed concerns over access and pressure on the surrounding road network. May come forward within the plan period. Not to be allocated as a strategic employment site.
15	Land east of Foxborough Hill, Eastry	Eastry	1.05	Part warehouse, part vacant/former garden centre	100 sqm		Site is promoted in HELAA. Considered to be suitable for smaller scale employment. Concern regarding the cumulative impact on the wider highway network from potential allocation sites within the village, particularly in relation to the rural lanes leading to/from the village and junctions on A256/A257/A258. May come forward within the plan period. Not to be allocated as a strategic employment site.
16	Land at Ringwould Alpines, Dover Road, Ringwould - site submitted 4 times by Lee Evans for B1, care home, holiday accommodation	Ringwould	1.19	Garden centre - retail	1,800 sqm		Site is promoted in the HELAA for a range of uses. It has been identified as being suitable for housing. It is also considered to be potentially suitable for employment uses. The access is constrained. May come forward within the plan period. Not to be allocated as a strategic employment site. Site allocated for housing in the housing allocations policy.

17	A20 Sites (incl. Citadel, Megger, Archcliffe Fort etc)	Dover	6.08	B1, B2 and B8 uses, also D1	0 sqm		There is a cluster of industrial and employment uses adjacent to the A20 at the entrance into the Dover Western Docks area, with excellent transport links. This site has not previously had any specific employment policy, but is clearly an important employment area with Megger, Archcliffe Fort, P&O and the Port Shipping Company at the gateway into the busy Dover Marina and port area. Limited opportunity for expansion. Protect employment uses, but not to be strategic allocation.
18	Dover Waterfront	Dover	12.27	Mixed - limited B1 uses	1,000 sqm	Site is currently allocated as a strategic site in the Core Strategy for mixed use re-development including employment uses. Site has been assessed as still being suitable for mixed use development including an element of employment. Considered a strategic allocation site, to coincide with the wider strategic and economic growth aims for Dover Town. Site also identified as a housing allocation.	
19	Aylesham Industrial Estate	Aylesham	15.8	B1, B2 and B8 uses	0 sqm		Established Industrial site. Limited opportunity for expansion. Protect employment uses, but not to be strategic allocation.
20	Port Zone, Whitfield (aka Old Park Barracks)	Whitfield	21.75	B1, B2 and B8 uses	0 sqm		Mixed use site, including industrial. Needs to be protected. Well located in terms of access to strategic road network. Potential for some redevelopment/ intensification. Protect employment uses, but not to be strategic allocation.
21	Dover Mid Town	Dover	5.99	Mixed - Retail/ Cultural/ Education/ Health/ Police/ Community/ Sport/ Office	1,000 sqm		Site is currently allocated as a strategic site in the Core Strategy for mixed use re-development including employment uses. Site has been assessed as still being suitable for mixed use development including an element of employment. Not to be strategic allocation. Site identified in the Dover Town

							Centre policy and the housing allocations policy.
22	Former Co-op Site and the adjacent Church Street Car Park	Dover	0.60	Retail/ Car Park	2,000 sqm		Site promoted in HELAA for mixed use development. Potential for B uses to be provided as part of the wider proposals for the development of this site. Not to be strategic allocation. Site identified in the Dover Town Centre policy.
23	Citadel	Dover	8.15	Mixed Greenfield and former barracks and vacant immigration centre	2,000 sqm		The Citadel site was previously used as an immigration removal centre and as an army barracks. Provided all the constraints identified can be overcome the site may be potentially suitable for employment uses (B1 primarily). May come forward within the plan period. Not to be strategic allocation.



## Appendix B – Reasons for alternative site boundaries

HELAA and SA Site References	Location	Proposed Use	Explanation of boundary change	Site boundary proposed for allocation and reason
AYL003 AYL003r AYL003r2	Land to the south of Spinney Lane, Aylesham	Housing	To reflect the site promotor's land ownership and remove a residential property not proposed for redevelopment.	AYL003r2 – The other options include land not available for development
CAP006 CAP006r	Land to the east of Great Cauldham Farm, Capel-le-Ferne	Housing	Site reduced in size from the landowner's submission to reduce impact on AONB	CAP006r – To protect the setting of the AONB and wider landscape impact of development
DOV017 DOV017r DOV017r2 emp DOV017r2 res	Dover Waterfront and Bench Street, Dover	Housing	Site has been divided into two sites to better reflect landownership and delivery potential. Site has been assessed for employment and housing.	DOV017r res – Bench Street allocation Dover Waterfront 18r – Waterfront allocation. As the sites have separate site specific policies.
DOV018 DOV18r	Mid Town, Dover	Housing	The site boundary was refined to remove areas which are not proposed for redevelopment. Site has been assessed for employment and housing.	Dov018r – The other option includes land not available for redevelopment
DOV022B DOV022Br	Land in Coombe Valley, Dover	Housing	The site boundary was extended to include the gasholder itself which was made available by the landowner	DOV022Br – To accommodate additional brownfield land available for development and provide comprehensive development
DOV026 DOV026r	Westmount College, Folkestone Road, Dover	Housing	The site boundary was extended to meet a line of trees at the site's northern boundary as it is within the same ownership.	DOV026r – To better reflect physical features on the ground
TC4S027 TC4S027r	Roosevelt Road, Dover	Housing	The site submitted comprised three parcels of land. One parcel was removed during the site suitability assessment	TC4S027r – Other parcels not considered to be suitable – see HELAA
TC4S039 TC4S039r	Chapel Hill, Eythorne	Housing	A small edit was made to the site's access where it had previously included an area of footpath	TC4S039r – To better reflect land available for development
LYD003 LYD003r	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Housing	The site's boundary was amended to remove a property, Glebelands, from its extent	LYD003r – The other option includes land not available for development
NON006 NON006r	Prima Windows, Easole Street/Sandwich Road, Nonington	Housing	The site's boundary was amended to remove a property, College Cottage, from its extent	NON006r - The other option includes land not available for development
SAN019 SAN019r	Sydney Nursery, Dover Road, Sandwich	Housing	Site boundary amended after initial suitability assessment carried out	SAN019r – Other site assessed as unsuitable in HELAA
SHE004 SHE004r SHE004r2	Land to the north and east of St Andrew's Gardens, Shepherdswell	Housing	The site's boundary was amended to assess an area accessible from two cul de sacs at St Andrews Gardens as suitable and the remainder of the site as unsuitable. Subsequently, the neighbouring land was also submitted for consideration so the two sites	SHE004r2 – to enable improved access arrangements and a comprehensive development

			were merged to form one continuous parcel	
WHI001 WHI001r	Land to the north west of Whitfield's current housing allocation	Housing	The site's boundary was edited to make it continuous with the boundary of the existing Whitfield housing allocation	WHI001r – no practical difference between two site boundaries
Discovery Park 2 2r 2r2	Discovery Park Enterprise Zone, Sandwich	Employment	The site was split to reflect the fact that the S half has extant planning permission for residential development. The N half of the site was then further amended to remove an area under development as a petrol station and retail area	2r2 – To reflect the area available for employment development
3 3r	Sandwich Industrial Estate	Employment	The site was refined to remove areas which are unavailable for further employment development	Not proposed for allocation as limited land available for development. Addressed by Policy E1 and E2.
4 4r	Aylesham Development Area	Employment	The site was refined to remove areas which are unavailable for further employment development	4r - To reflect the area available for employment development
7 7r 7r2 7r3	White Cliffs Business Park Phases I-III	Employment	The site was extended to include an additional parcel, before being refined to exclude areas proposed for landscaping. The site was then further extended to the east giving the Reg19 site extent	7r3 – Site area selected to meet the needs for employment land whilst protecting the wider landscape
18 18r	Dover Waterfront	Employment	Site has been divided into two sites to better reflect landownership and delivery potential. Site has been assessed for employment and housing.	18r – To allocate as separate sites within individual site policies
21 21r	Dover Mid Town	Employment	The site boundary was refined to remove areas within the existing allocation but which are not proposed for redevelopment. The site was also assessed for housing	21r – To reflect areas available for development
TC4S083 23r	The Citadel Western Heights	Mixed Use	The Citadel was submitted through the TC4S and proposed a smaller part of the site for employment development.	23r - The final site extent reflects the ambition to bring forward a comprehensive scheme which brings the site's heritage assets back into use but also provides space for mixed use redevelopment to enable this.

## **Appendix E**

### **Sequential and Exception Tests Summary and Review Note**



## **Planning and Flood Risk**

### **Regulation 19 Local Plan – A Sequential Approach to Site Selection**

#### **Introduction:**

Local Planning Authorities are required to undertake a Strategic Flood Risk Assessment to fully understand the flood risk in the area to inform Local Plan preparation.

In plan-making, local planning authorities are also required to apply the sequential test approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.

The Council has undertaken a Strategic Flood Risk Assessment (2019) and a Level 2 Strategic Flood Risk Assessment (2021) to inform the preparation of the Local Plan and the selection of the proposed site allocations.

This paper uses the findings of the Level 1 and Level 2 SFRA for the District and sets out the results of the sequential test and exceptions test of the proposed site allocations, that was undertaken by officers, to inform the preparation of the new Local Plan.

#### **Background**

##### National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021 at paragraph 159 makes clear that development in areas of flood risk should be avoided and directed to areas of the lowest risk. Where development is necessary in flood areas, the NPPF states that development should be made safe for its lifetime without increased flood risk elsewhere. For the Local Plan this means that sites sought for development should be allocated in areas at the lowest risk of flooding. Where through the Local Plan site selection process, development maybe necessary in areas at risk of flooding, then the Policies in the Plan should set out levels of mitigation to make the development resilient to, and not increase the risk of flooding.

## Planning Practice Guidance

The Planning Practice Guidance (PPG) provides detail on how development in a Local Plan should consider flood risk. Through a Strategic Flood Risk Assessment (SFRA) the Sequential Test<sup>1</sup> and where necessary a Exception Test<sup>2</sup> should be applied when determining land use allocations. The PPG makes clear the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. All development proposed within the Local Plan is subject to the Sequential Test, if a site is found in Flood zone 1 then the test is passed for that site, if a site is found in Flood zone 2 or higher then the site subjected to the Exception Test, subject to the vulnerability classification of the development.

The PPG sets out that the Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. There are 2 parts to the Exception Test, firstly that the proposed development would provide wider sustainability benefits to the community that outweigh flood risk, and secondly, that the development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

## Regulation 19 Pre-Submission Local Plan

The distribution of growth proposed in the Local Plan growth strategy is primarily based on the District's settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Here, a key aim of the Local Plan growth strategy is to focus development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historical environment.

The Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield, where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create a new neighbourhood with supporting infrastructure. Approximately half of the District's new housing development is planned here, the majority of which is to be delivered as part of the urban expansion at Whitfield.

If the distribution of housing growth in the district were to purely follow the settlement hierarchy the secondary focus for development should be the District Centre of Deal, followed by the Rural Service Centres of Sandwich and Aylesham. However, Deal has seen high levels of windfall development over the past ten years, due to market demand, which has resulted in a limited supply of suitable housing sites. Housing delivery in Deal and Sandwich also continues to be constrained by a number of factors including: flood risk, wildlife sites, heritage and highways. Given this, it has been a challenge to identify suitable and available sites in Deal and Sandwich and the growth potential of these settlements is therefore currently considered to be relatively limited.

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<sup>1</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-Local-Plan>

<sup>2</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section>

As a result, the remaining housing growth (not already identified at the main settlements of Dover Deal and Sandwich) is planned to be delivered through the strategic expansion of Aylesham, in line with the original vision conceived by Sir Patrick Abercrombie in 1928 for Aylesham to become a small garden town. In addition, there will be development in the rural area of the District, distributed across the District's local centres and large and small villages, taking into account existing constraints, site availability and the settlements position in the settlement hierarchy.

Here, a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with national policy. New housing can enable rural communities to retain and strengthen existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

As part of the Council's strategy for the rural area it is proposed to grow the adjacent villages of Eythorne and Elvington to create a new local centre in the District, with new services and facilities to be delivered alongside new homes.

Managing flood risk and coastal change has been identified as one of the key issues for the Local Plan to address. This is further iterated through the Plans Strategic Objective to create a Spectacular and Sustainable Environment by managing flood risk sustainably in a way that ensures the safety of residents and property and take opportunities to reduce flood risk where possible.

To accomplish the objective of managing flood risk sustainably a number of Policy criteria have been set out within the Local Plan, including:

*Strategic Policy 1.8 Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;*

*Strategic Policy 1.9 Improving water efficiency; and*

*Strategic Policy 1.10 Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.*

*Climate Change Policy 5 - Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted as an exception and where it is demonstrated by a site-specific Flood Risk Assessment (FRA), carried out in accordance with the requirements set out in the Council's Strategic Flood Risk Assessment, that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.*

*The FRA should be prepared in accordance with the guidance set out in the Council's 'Site-specific Guidance for Managing Flood Risk'. For development identified by the FRA to be at risk of flooding from any source, flood mitigation should be implemented in accordance with the Flood Risk Management hierarchy outlined in the document 'Site-specific Guidance for Managing Flood Risk'.*

*Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.*

Furthermore, due to the identification of flood risk on a number of strategic and non-strategic site allocations in the Plan, policy criteria have also been included in the site allocation policies, requiring a site specific flood risk assessment to be carried out and submitted with any planning application for development.

The approach to managing flood risk set out in the Regulation 19 Pre-Submission Local Plan has been informed by engagement with stakeholders, including the Environment Agency, at different stages in the Plan making process. Comments made as part of the Regulation 18 consultation on the draft Local Plan have been taken into account when updating the Plan for Regulation 19 and policies have been updated accordingly.

#### Strategic Flood Risk Assessment (2019)<sup>3</sup>

To inform the preparation of the new Local Plan a Strategic Flood Risk Assessment (SFRA) was carried out to identify areas at risk from flooding. The SFRA was published in 2019 and provides the latest planning policy context and flood risk information for the District. The SFRA:

- Identifies the risk of flooding from each source of flooding at key locations within the district;
- Assesses the impact that land use changes and development in the area will have on flood risk;
- Informed the Local Plans sustainability appraisal so that flood risk is taken into account when considering strategic land use policies;
- Provides data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary; and,
- Supports the Council's policies for the management of flood risk within Local Development Documents and assists with the testing of site proposals.

#### Strategic Flood Risk Assessment Level 2 (2021)<sup>4</sup>

A Level 2 SFRA was carried out in 2021 to inform the suitability and where necessary the potential for mitigation of sites considered for allocation within the Regulation 19 version of the Local Plan. The Level 2 SFRA applied the:

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<sup>3</sup> <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/strategic-flood-risk-assessment-2019-sfra.pdf>

<sup>4</sup> To be inserted

- Sequential Test<sup>5</sup> by identifying the severity and variation on risk within medium and high flood areas:
- Established whether proposed allocations or windfall sites on which the Local Plan will rely are capable of being made safe through their lifetime without increasing flood risk elsewhere; and,
- Where required applied the Exception Test<sup>6</sup>.

### Housing and Economic Land Availability Assessment

The Council has undertaken a Housing and Economic Land Availability Assessment (HELAA) to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. As part of this exercise a call for sites was carried out in 2017 inviting submissions of all types of site for development. To further the site options, specifically with reference to niche sites for need like Gypsy and Traveller and Self Build, a further targeted call for sites was carried out in 2021. All sites submitted were subjected to the HELAA assessment process. With regards to flood risk, every site was subjected to GIS analysis to determine whether the site was within, or partially within, or within 400m of, an identified source of flood risk.

In addition to this, sites were also assessed against other criteria including, highways, landscape, biodiversity, heritage, environmental and sustainability (through proximity to settlement areas) to determine their suitability. Here, sites were assessed in relation to the level of impact they were considered to have on each assessment criteria. Sites were then ranked either Green, with little to no impact, or that the impact could be mitigated; Amber, a level of impact and further consideration of mitigation required; or Red, where the levels of impact were severe, and mitigation could not be accomplished. The Green and Amber assessed HELAA sites were then assessed against the Local Plan development strategy, which determined that development should be directed towards the most sustainable locations in accordance with the overarching growth strategy. With regards to Flood Risk, sites were only considered where there was an impact from the risk if they were in the most sustainable, and on balance, most suitable locations, against the Districts settlement hierarchy and growth strategy. For example, urban areas, or where flood risk mitigation could be accommodated, and where other sites on balance, against the assessment, had a greater negative impact.

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<sup>5</sup> NPPF 2021 paragraph 161. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

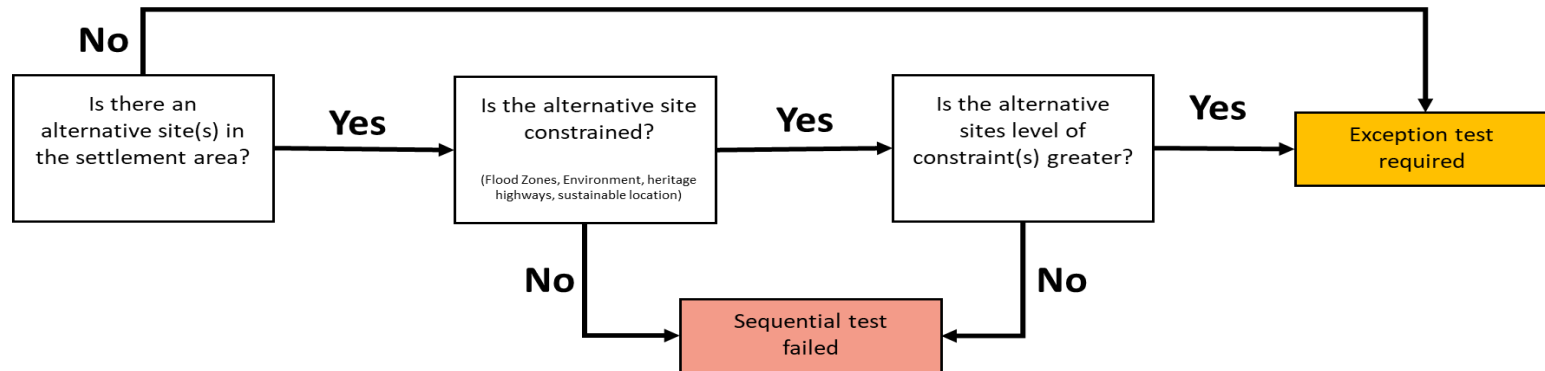
<sup>6</sup> NPPF 2021 paragraph 164. The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

## Sustainability Appraisal

To inform and guide the preparation of the Local Plan a Sustainability Appraisal has been undertaken. The Appraisal focuses on the likely environmental effects of the Local Plan whilst also considering a range of matters extending to social and economic impacts. As part of the environmental effects, the sources of flood risk were considered by identifying the extent and level of risk within the District and the sites impacted. The sites and level of flood risk upon them was then assessed against the objectives of the Local Plan and the range of other planning matters including proposed policies within the Local Plan. The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. It concluded that on all sites impacted by flood risk there was considered to be scope to avoid or significantly mitigate the impact through the policies in the Local Plan.

## Process

The diagram below illustrates the Councils approach to the Sequential Test of sites identified through the Plan making process. The findings of this process are outlined below.



**Diagram 1. Sequential Test process of sites in Flood Zone 2 and 3**

## Application of the Sequential Test

Officers have applied the Sequential Test to the proposed site allocations (housing, employment and Gypsy and Traveller pitches) in the Local Plan, based on the findings of the Level 2 SFRA and the results of the assessment are set out below:

### Development Proposed in Flood Zone 1 and with a Low Chance of Surface Water Flooding

There were 103 sites considered in the Level 2 SFRA, of which 81 have been identified as being in Flood Zone 1 and at low risk of surface water flooding. These sites are considered to meet the requirements of the Sequential Test and are subsequently considered sites that avoid flood risk to people and property.

Sites in Flood Zone 1 and at 'very low' risk of flooding, smaller than 1 ha				
Reference	Site Address	Settlement	Site area (ha)	Capacity
DM10	Romany Acres, Caravan, Romany Acres, Belsey Lane, Ewell Minnis CT15 7DY	Ewell Minnis	0.25	4
TC4S026	Military Road	Dover	0.11	9
DM10	Plot 2B Bluebell Place (Bluebell Place), Ham, Eastry, CT13 0ED	Eastry	0.10	1
DM10	Plot 1A, Land at Hay Hill (The Oaklands), Ham, Eastry, CT13 0ED	Eastry	0.11	2
ASH015	Former Council Yard, Molland Lea, Ash	Ash	0.16	5
DM10	Plot 3 Strawberry Place (1 Strawberry Place), Ham, CT13 0ED	Eastry	0.19	2

TC4S028	Peverell Road	Dover	0.19	6
TC4S030	Colton Crescent	Dover	0.2	10
RIN004	Ringwould Alpines, Dover Road, Ringwould	Ringwould	0.22	5
DOV019	Albany Place Car Park, Dover	Dover	0.28	15
DOV008	Land adjoining 455 Folkestone Road, Dover	Dover	0.34	5
DOV030	Land at Durham Hill, Dover	Dover	0.34	10
ASH011	Gulston, Ash	Ash	0.78	10
SAN019	Sydney Nursery, Dover Road, Sandwich	Sandwich	2.05	10
ASH003	Land south of Mill Field	Ash	0.55	8
TC4S023	Land adjacent to Cross Farm	Eastry	0.44	10
CAP009	Longships, Cauldham Lane, Capel le Ferne	Capel le Ferne	0.49	10
TC4S082	Land Adjacent Mill House, Shepherdswell	Shepherdswell	0.58	10
STM007	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site B)	St Margarets at Cliffe	0.63	18
STM008	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site A)	St Margarets at Cliffe	0.63	18



TC4S074	Land adjacent Courtlands	Kingsdown	0.71	5
CAP013	Land at Cauldham Lane, Capel le Ferne	Capel le Ferne	0.76	50
GTM003	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	3.33	10
TC4S076	Statenborough Farm, Eastry	Eastry	0.82	0.81ha
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	Worth	0.83	15
WIN003	Land adjacent to Staple Road	Wingham	0.83	20
SHE013	Land around Coldred	Shepherdswell	0.83	5
<b>Sites in Flood Zone 1 and at 'very low' risk of flooding, greater than 1 ha</b>				
RIN002	Land at Ringwould Alpines, Dover Road, Ringwould	Ringwould	1.01	10
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	Nonington	1.14	35
WOO006	Land south of Sandwich Road, Woodnesborough	Woodnesborough	3.15	10
EYT008	Land on the southeastern side of Roman Way, Elvington	Eythorne and Elvington	1.65	50
SHE004	Land at Shepherdswell, between St Andrew's Gardens, Mill Lane and Meadow View Road	Shepherdswell	5.46	40
EYT012	Sweetbriar Lane, Elvington	Eythorne and Elvington	1.85	50

STM010	Land located between Salisbury Road and The Droveaway, St Margaret's-at-Cliffe	St Margarets at Cliffe	2.72	10
ELR4	Aylesham Development Area	Aylesham	4.2	
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	Kingsdown	3.46	50
WIN014	Footpath Field, Staple Road, Wingham	Wingham	3.60	50
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	Langdon	4.68	40
<b>Sites in Flood Zone 1 with &lt;40% of the site at risk of surface water flooding</b>				
TC4S039	Chapel Hill, Eythorne	Eythorne and Elvington	0.21	5
STA004	Land at Durlock Road, Staple	Staple	0.24	3
AYL001	Land at Dorman Avenue North, Aylesham	Aylesham	0.31	9
DOV006	Land at Dunedin Drive (south), Dover	Dover	0.37	8
SHE008	Land off Mill Lane, Shepherdswell	Shepherdswell	0.38	10
AYL002	Land at Boulevard Courrieres, Aylesham	Aylesham	0.61	17
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	1.03	5
PRE003	Apple Tree Farm, Stourmouth Road	Preston	0.76	5

DOV022B	Land in Coombe Valley, Dover	Dover	0.91	40
PRE016	Site north of Discovery Drive, Preston	Preston	1.10	20
STM006	Land at New Townsend Farm, Station Road, St Margaret's	St Margaret's at Cliffe	13.35	10
TC4S050	Sherley's Farm	St Margarets at Cliffe	1.49	1
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	St Margarets at Cliffe	3.57	40
ASH014	Land to the south of Sandwich Road, Ash	Ash	3.34	60
DOV022E	Land in Coombe Valley, Dover	Dover	3.69	220
EAS002	Land at Buttsole Pond, Lower Street, Eastry	Eastry	3.93	80
CAP006	Land to the east of Great Cauldham Farm, Capel le Ferne	Capel le Ferne	6.35	50
EYT003	Land adjoining Terrace Road, Elvington	Eythorne and Elvington	8.07	150
DEA008	Land off Cross Road, Deal	Deal	8.73	100
TC4S083	The Citadel, Western Heights, Dover	Dover	14.82	TBD
TC4S120	WCBP Potential Phase 4	Whitfield	27.71	TBD
	Tilmanstone Spoil Tip, Elvington	Eythorne and Elvington	TBD	TBD

ELR7	White Cliffs Business Park Phases I-III	Whitfield	54.7	
AYL005	Land off Holt Street, Snowdown, Aylesham	Aylesham	41.77	40
GUS002	Connaughts Barracks, Dover	Dover	54.98	300
WIN004	Land adjacent to White Lodge, Preston Hill	Wingham	0.31	8
ALK003	Land at Short Lane, Alkham	Alkham	0.32	10
TC4S027	Roosevelt Road	Dover	0.32	10
CAP011	Former Archway Filling Station, New Dover Road, Capel le Ferne	Capel le Ferne	0.66	10
SHE006	Land west of Coxhill Road, Shepherdswell	Shepherdswell	0.82	10
EAS009	Eastry Court Farm, Eastry	Eastry	0.84	5
TC4S008	Bridleway Riding School, Station Road	Deal	1.09	25
DOV026	Westmount College, Folkestone Road, Dover	Dover	1.43	60
EYT001	Land at Monkton Court Lane	Eythorne and Elvington	1.94	20
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	Preston	2.53	40
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	3.43	40

WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	Walmer	4.44	50
ASH004	Land to the north of Molland Lane, Ash	Ash	4.46	110
SHO002	Land southwest of Sandwich Road, Sholden	Sholden	23.68	100
TC4S092	Fort Burgoyne	Dover	7.69	TBD
AYL004	Farmland lying to the north of Aylesham and to the west of the B2046 (Adisham Road)	Aylesham	36.35	500
AYL003	Land to the south of Spinney Lane, Aylesham	Aylesham	132.22	640
WHI008	Whitfield Urban Expansion	Whitfield	310.12	5575

Development Proposed in Flood Zone 1 with a High Chance of Surface Water Flooding

Of the 103 sites considered in the Level 2 SFRA, 6 have been identified as being in Flood Zone 1, but with a high chance of surface water flooding.

<b>Sites Flood Zone 1 with a High Chance of Surface Water Flooding</b>				
<b>Reference</b>	<b>Site Address</b>	<b>Settlement</b>	<b>Site area (ha)</b>	<b>Capacity</b>
TC4S044	Halfacres, Short Lane, Alkham, CT15 7BZ	Alkham	0.17	3
DOV022C	Land in Coombe Valley, Dover	Dover	0.37	20
SAP2	Land to the south of Alkham Valley Road / land to the rear of The Meadows, AVR, Alkham, CT15 7EW	Alkham	0.86	10

GOO006	Land adjacent to Short Street, Chillenden	Goodnestone	1.02	5
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Lydden	2.18	30
EYT009	Land to the east of Terrace Road, Elvington	Eythorne and Elvington	10.34	150

The majority of sites proposed to be allocated in the Plan are in Flood Zone 1 and therefore pass stage 1 of the sequential test for Local Plan preparation. However, these sites do not fully meet the housing requirement set out in the Local Plan and therefore other sites in Flood Zones 2 and 3 have also had to be considered. This is due to two main reasons: the first being the fact that the Council have been unable to identify a sufficient supply of suitable sites, through the HELAA process within Flood Zone 1, due to other planning considerations and constraints that have had to be weighed against flood risk; and second due to the highly constrained nature of the Districts three most sustainable settlements (Dover, Deal and Sandwich). As a result of this, sites located within, or partially within, Flood Zones 2 and 3 have been considered as part of the preparation of the Local Plan, where, on balance, they are less constrained on other planning considerations, are sustainably located and offer opportunities for the regeneration of brownfield land.

#### Development Proposed in Flood Zone 2

There has been 1 site identified as located within Flood Zone 2.

<b>Sites located in Flood Zone 2</b>					
<b>Reference</b>	<b>Site Address</b>	<b>Settlement</b>	<b>Site area (ha)</b>	<b>Capacity</b>	<b>% of site in Flood zone</b>
WOR006	Land to the east of Jubilee Road	Worth	1.27	10	46.78

One site has been considered in Flood Zone 2 due to its sustainable location adjacent to the settlement of Worth. The site also has lower levels of impact on other planning matters than alternative sites in the settlement area. The site is classed as more vulnerable and therefore not subject to the exceptions test. No further sites that are just in Flood Zone 2 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zones 2,3 and 3b.

Development Proposed in Flood Zones 2, 3, and 3b

There have been 13 sites identified as been located or partially located within Flood Zones 3, 3 and 3b.

<b>Sites located in Flood Zones 2 and 3</b>										
<b>Reference</b>	<b>Site Address</b>	<b>Settlement</b>	<b>Site area (ha)</b>	<b>Capacity</b>	<b>Flood Zone 2</b>	<b>% of site in Flood zone 2</b>	<b>Flood Zone 3</b>	<b>% of site in Flood zone 3</b>	<b>Flood Zone 3b</b>	<b>% of site in Flood zone 3b</b>
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	2.19	40	Y	0.45	Y	2.03	N	
NOR005	Betteshanger Colliery, Betteshanger, Deal	Deal	20.69	210	Y	0.23	Y	4.88	N	
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	1.58	35	Y	11.68	Y	10.51	N	
ELR1	Ramsgate Road, Sandwich	Sandwich	81.6	TBD	Y	7.05	Y	34.93	Y	8.19
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	3.30	40	Y	9.97	Y	42.18	N	
ELR2	Discovery Park Enterprise Zone, Sandwich	Sandwich	77.04	TBD	Y	13.69	Y	79.13	Y	1.88
SAN006	Sandwich Highway Depot, Ash Road, Sandwich	Sandwich	2.09	32	Y	0.48	Y	96.16	N	
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	0.70	35	Y	27.26	Y	69.85	N	
DOV028	Charlton Shopping Centre, High Street, Dover	Dover	0.63	100	Y	7.39	Y	0.28	Y	0.23

DOV018	Mid Town	Dover	5.99	100	Y	16.85	Y	43.00	Y	8.32
DOV023	Buckland Mill, Dover	Dover	2.38	124	Y	58.86	Y	7.46	Y	5.83
DOV017	Dover Waterfront	Dover	12.27	263	Y	4.09	Y	64.24	Y	50.33
	Bench Street	Dover	0.99	TBD	Y	5	Y	5	N	

These sites have been considered as part of the plan making process for a number of reasons:

- The site is sustainably located either within, or in close proximity to the District's main settlements of Dover Town and Sandwich and is in accordance with the growth strategy set out in the Local Plan;
- The site is previously developed;
- The site is an existing land allocation - Dover Waterfront, Bench Street and Mid Town Dover;
- The site has existing planning consent for either housing, employment or mixed use development - Discovery Park, Sandwich, Buckland Mill Dover and Betteshanger Colliery, Deal;
- The site offers significant regeneration opportunity;
- The site is relatively unconstrained in other terms and would have low levels of impact in relation to other planning matters; and
- The limited availability of other sites, which are not significantly constrained, in these locations.

Of the sites considered in Flood Zones 2, 3 and 3b the following will need to be subject to the exceptions test: NOR005, SAN007, ELR1, SAN004, ELR2, SAN006, SAN008, DOV028, DOV018, DOV023, DOV017 and Bench Street Dover.

No further sites that are in Flood Zones 2 and 3 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zone 3.

### Development Proposed in Flood Zone 3

There have been 3 sites identified as been located or partially located within Flood Zone 3.

<b>Sites located in Flood Zone 3</b>
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Reference	Site Address	Settlement	Site area (ha)	Capacity	Flood Zone 3	Flood zone 3 %
TC4S032	Ethelbert Road garages	Deal	0.09	5	Y	100.00
TC4S047	104 Northwall Road, Deal	Deal	0.28	8	Y	100.00
ELR3	Sandwich Industrial Estate	Sandwich	22.9	TBD	Y	100.00

The three sites located within Flood Zone 3 have been considered due to their sustainable location within, or partially within the settlements of Deal and Sandwich and their low levels of impact on other planning matters. Further, Ethelbert Road and Sandwich Industrial Estate are both brownfield sites and 104 North Wall Road is partially brownfield, and the redevelopment of these sites provides the potential for regeneration in those locations.

Of the sites considered in Flood Zone 3 the following will need to be subject to the exceptions test: TC4S032 and TC4S047.

### Application of the Exception Test

The NPPG provides detail on the type of development, by flood zone, the exception test should be applied to<sup>7</sup>. The exception test should demonstrate that the proposed development of a site would provide wider sustainability benefits to the community that outweigh the flood risk; and will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

The SFRA 2 has identified 14 sites within Flood Zones 2 and 3 and 2 sites in Flood Zone 3 that should be subject to the Exception Test. It is considered that the 14 sites subjected to the exception test are the most suitable and available sites that provide sustainability benefits to the community that outweigh the flood risk. The table below set out the SFRA2 recommendations for each site, how they have been adapted to Policy in the Local Plan and the concluding benefits that allocating each site brings.

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<sup>7</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/575184/Table\\_3\\_-\\_Flood\\_risk\\_vulnerability\\_and\\_flood\\_zone\\_compatibility\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf)

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
NOR005 Betteshanger Colliery, Betteshanger, Deal	Housing More vulnerable FZ 2 & 3	This site now has planning permission and therefore will not be allocated in the Local Plan. The exception test is therefore not required.	N/A	N/A
SAN007 Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are also in flood zones and on balance, taking into account other planning considerations, are less suitable for development.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required. Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion. Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable.	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.

			<p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 16m of a tidal waterbody or tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit.</p> <p>When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defences upgrades should be shared amongst the beneficiaries.</p>	
ELR1 Ramsgate Road, Sandwich	Employment Less Vulnerable FZ 2 & 3b	Site is not proposed to be allocated in the Local Plan. The exception test is therefore not required	N/A	N/A
SAN004 Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, being partially within the Sandwich settlement confine and adjacent to existing residential and commercial uses. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. The	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

		<p>site is less constrained than the alternative available sites and offers the opportunity for regeneration.</p>	<p>Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defence upgrades should be shared amongst the beneficiaries.</p>	
<p>ELR2 Discovery Park Enterprise Zone, Sandwich</p>	<p>Commercial Less vulnerable FZ 2 &amp; 3b</p>	<p>The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. Existing brownfield site with viable employment uses. Site benefits from existing planning permission for mixed use development including employment, commercial and housing.</p> <p>The site is proposed for intensification to meet the Districts need for employment land. The site is less constrained than other available sites for employment use and has greater potential for intensification than the alternative sites.</p> <p>The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>During all three modelled scenarios there are only localized areas of surface water accumulation shown within the highways and against the existing buildings. This could be attributed to topographic depressions.</p> <p>A detailed FRA is required.</p> <p>Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance.</p> <p>All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised.</p>	<p>Site isn't allocated in the Local Plan as already has planning permission. Any future applications to be determined against Local Plan Policy CC5 - Flood Risk and CC6 - SuDs.</p>

		significantly mitigate any negative effects through the policies in the Local Plan.	Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion. The EA should be consulted where development is proposed within 16m of a tidal waterbody or tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit.	
SAN006 Sandwich Highway Depot, Ash Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. The site is less constrained than the alternative available sites and the site offers the opportunity for regeneration.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions.	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.
SAN008 Woods' Yard, rear of 17	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –	Site allocation policy for this site includes criteria to manage flood risk and

Woodnesborough Road, Sandwich		<p>growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are in flood zones and are less suitable for development. The site offers the opportunity for regeneration.</p>	<p>A detailed FRA is required          Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary.          The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.          Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable.          Flood resilience and resistance measures should be considered for inclusions</p>	<p>requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.          SuDs should be provided in accordance with Local Plan Policy CC6.</p>
DOV028 Charlton Shopping Centre, High Street, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is previously developed, sustainable located within the urban area and has the opportunity to provide regeneration to the centre of Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –          A detailed FRA is required including a comprehensive investigation into surface water flood risk.          All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site          The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.          SuDs should be provided in accordance with Local Plan Policy CC6.</p>

		<p>negative effects through the policies in the Local Plan. It is considered that it is less constrained and more sustainably located than alternatives sites not proposed in the Local Plan.</p>	<p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	
DOV018 Mid Town, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainably located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires detailed flood modelling to be undertaken and a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuDs should be provided in accordance with Local Plan Policy CC6.</p>

			<p>increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	
DOV023 Buckland Mill, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuDs should be provided in accordance with Local Plan Policy CC6.</p>
DOV017 Dover Waterfront	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and</p>



		<p>to access to employment, services and transport. The site is an existing allocation that is brownfield and undergoing site wide regeneration that in later stages will include homes. The site is providing regeneration to Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>A detailed FRA is required All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	<p>requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
Bench Street Dover	Mixed Use More Vulnerable	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment,</p>	<p>Development to be located in the lowest areas of flood risk on the site. Internal layout of buildings particularly where floor levels cannot be raised should be located in areas at lowest risk of flooding. A Surface Water Management Strategy to be produced to show how SuDS will be included to manage surface water runoff from the site</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>

		<p>amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>		
TC4S032 Ethelbert Road garages	Housing More vulnerable FZ3	<p>The site is in Deal, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location being located within Deal urban area. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained, more sustainable located than the alternatives sites not proposed in the Local Plan and offers the opportunity for regeneration.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
TC4S047 104 Northwall Road, Deal	Housing More vulnerable FZ3	<p>The site is in Deal, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment,</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific</p>

		<p>services and transport. The site is partially previously developed and in a sustainable location being located in part within Deal urban area. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>SuDs should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised. Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of a main river to obtain consent via a Flood Risk Activity Permit (FRAP) The LPA should be consulted prior to the commencement of any works to obtain consent for any development proposed within 8m of any ordinary watercourse. Where the watercourse falls within the RSIDB area, the RSIDB should be consulted to obtain consent.</p>	<p>Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
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## Conclusion

Managing flood risk has been a key consideration in the Plan making process. There were 103 sites considered in the Level 2 SFRA, of which 14 sites were required to be assessed through the exception test. Sites located within flood zones have been assessed through the SFRA 2, sequential and exception tests

with the sites then provided with actions and recommendations for flood mitigation. Those actions and recommendations have been considered in the preparation the of the Local Plan and embedded within the climate change and site allocation policies. The 14 sites subject to the exception test were found to be the most suitable of those made available through the HELAA in the Districts settlement areas and are considered to provide sustainability benefits to the community that outweigh the flood risk.

**Appendix F**  
**Site Options Assessment**  
**Proformas**