

# Sustainability Appraisal Addendum

## Introduction

**1.1** Dover District Council received a Regulation 19 consultation response from Natural England on the 9<sup>th</sup> December 2022. The response included several comments on the contents and judgements made in the Publication Local Plan Habitat Regulations Assessment (HRA) Report in line with the precautionary principle. Natural England advise that some judgements in the HRA are too precautionary and could be revised. The Publication Local Plan HRA Report has consequently been updated. The Sustainability Appraisal (SA) Report accompanying the Publication Local Plan consultation drew on the findings of the HRA Report to determine the likely effects of the Local Plan on SA objective 9 (Biodiversity). Consequently, this SA Addendum summarises the changes to the HRA Report findings and confirms whether these changes have affected any of the associated conclusions made in the SA Report.

## Physical damage and loss of functionally linked land (offsite) effects

**1.2** Following Natural England's comments on the HRA of the Publication Local Plan published as part of the Regulation 19 consultation, some changes have been made to the HRA. Only one change alters the overall conclusions of the HRA of the Publication Local Plan. This change relates to the alteration of the distance buffer used to screen-in policies with potential to result in physical damage and loss of land functionally linked to European ecological sites. The distance buffer has been reduced from 15km to 5km in line with Natural England's recommendation, resulting in fewer site allocation policies being screened in as having potential to generate significant adverse effects on European sites and previously recorded likely significant effects on the Dungeness, Romney Marsh and Rye Bay SPA being screened out entirely.

**1.3** The following site allocation policies recorded in the SA as having the potential for significant or minor negative effects on SA objective 9 (Biodiversity) are no longer considered likely to result in the physical damage or loss of land functionally linked to European sites:

- 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 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).

**1.4** Drawing on the HRA of the Publication Local Plan, the SA referenced the potential of such sites to support Golden Plover, given the dependency of these species on offsite arable fields and grasslands; however, this is no longer thought to be the case for European sites over 5km away. Consequently, the adverse effects previously recorded against SA objective 9 (Biodiversity) for the above policies are likely to be reduced in part. However, the overall policy-off effects recorded against SA objective 9 (Biodiversity) in the site assessments set out in **Appendix F** remain unchanged due to the fact that the referenced sites are also in close proximity to other national and/or local ecologically sensitive wildlife sites not assessed in through the HRA process.

**1.5** The HRA of the Publication Local Plan, both before and after the update, concludes that sufficient safeguards and mitigation measures have been put in place to ensure no adverse effects on the integrity of European sites. **Table 7.18** in

**Chapter 7**<sup>1</sup> of the SA Report lists Publication Local Plan policies that will help to mitigate the adverse effects of the site allocations on SA objective 9 (Biodiversity):

- Strategic Policy 1: Planning for Climate Change.
- Climate Change Policy 2: Sustainable Design and Construction.
- 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.
- Strategic Policy 8: Dover Town Centre.
- Strategic Policy 11: Infrastructure and Developer Contributions.
- Place Making Policy 3: Providing Open Space.
- Place Making Policy 5: Protection of Open Space, Sports Facilities and Local Green Space.
- Strategic Policy 2: Planning for Healthy and Inclusive Communities.
- Place Making Policy 1: Achieving High Quality Design, Placemaking and the provision of Design Codes.
- 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.

## Water quantity and quality effects

**1.6** Paragraph 7.542 in **Chapter 7** of the SA Report referenced that adverse effects on the integrity of local European sites could not be ruled out until further information was provided, and where necessary appropriate mitigation measures put in place, to rule out water quality effects. In September 2022, Natural England confirmed, based on the further work commissioned by the Council, that there will be no significant water quality impacts on the Stodmarsh suite of designated sites via the Dambridge Wastewater Treatment Works. Therefore, the potential significant adverse effects on SA objective 9 (Biodiversity) caused by potential poor water quality can now be ruled out.

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<sup>1</sup> The findings of the HRA of Draft Local Plan which influenced the findings of the SA of the Draft Local Plan set out in **Chapter 6** of the SA Report are not updated in this section given that this stage of the assessment represented an earlier point in time in the development of the Local Plan.

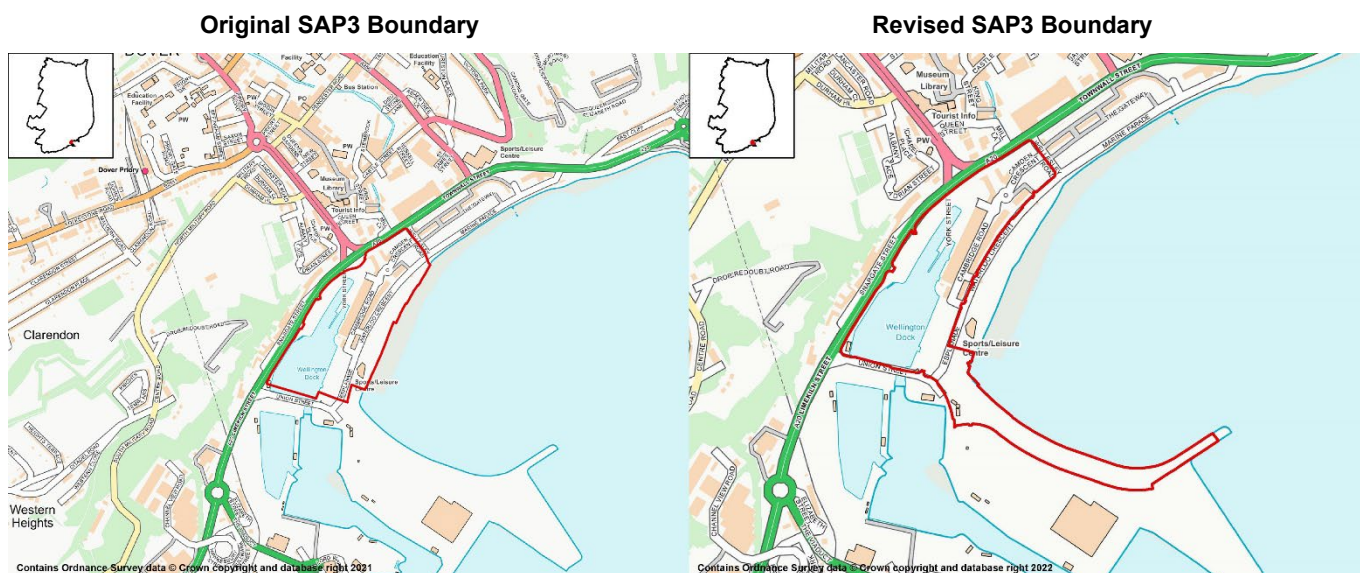
# Sustainability Appraisal Errata Sheet II

## Introduction

1.7 During the Regulation 19 consultation on the Publication Local Plan, Dover District Council discovered an error in the boundary of Site Allocation Policy 3 (SAP3 – Dover Waterfront). The corrected site boundary of SAP3 has been subjected to Sustainability Appraisal (SA). This errata sheet sets out the results.

1.8 **Figure 1** illustrates the difference between the original SAP3 site allocation boundary and the new corrected one (SAP3r).

**Figure 1: Comparison between the original SAP3 site allocation boundary and the new revised boundary (SAP3r)**



1.9 A manual reporting error was also identified **Chapters 5 and 6 and Appendix F** of the SA Report following the reappraisal of a variant of site option AYL004 (AYL004r) in Aylesham, which resulted in the site references and the effects reported for SA objectives 4 (Transport) and 8 (Climate Change) being incorrectly swapped. The SA results for Aylesham sites AYL004 and AYL004r have therefore been checked and updated as necessary.

## Appraisal undertaken

1.10 SAP3/SAP3r is allocated for mixed-use development including retail, restaurants and cafés, assembly and leisure, a hotel, offices within Class E g(i) and residential. The updated site boundary (SAP3r) has therefore been appraised against both the residential site assessment criteria and employment site assessment criteria set out in **Appendix C** of the SA Report.

1.11 The appraisal of site options in **Chapter 5** of the SA Report are '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** in the SA Report.

1.12 Policy-off and policy-on assessments of SAP3r are set out below. LUC has also corrected the manual reporting error in relation to SA objectives 4 (Transport) and 8 (Climate change) for Aylesham sites AYL004 and AYL004r.

## Results of the appraisal

### Policy-off effects

1.13 The policy-off appraisal of the updated Dover Waterfront boundary (SAP3r) has resulted in no changes in the effects recorded for the original SAP3 site boundary. This can be attributed to the fact that the main boundary changes extend out to sea where there are no additional services and facilities, or additional sensitive receptors.

**1.14** The site assessment proforma for the original site boundary (SAP3) can be found in **Appendix F** of the SA Report under the site references 'DOV017r' (for residential use effects) and '18r' (for employment use effects). **Table 1** shows the policy-off effects recorded for both the original (SAP3) and revised (SAP3r) Dover Waterfront site allocation boundary.

**Table 1: Comparison of SAP3 and SAP3r policy-off effects**

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>Residential Site Assessment</b>												
SAP3 (DOV017r)	+	+	--	+	+	-	0?	--	+	-	-?	0?
SAP3r	+	+	--	+	+	-	0?	--	+	-	-?	0?
<b>Employment Site Assessment</b>												
SAP3 (18r)	0	+	--	+	+	-	0?	--	+	--	-?	0?
SAP3r	0	+	--	+	+	-	0?	--	+	--	-?	0?

**1.15** The SA of the revised site boundary for Site Allocation Policy 3 (SAP3 – Dover Waterfront) has resulted in no changes to the effects recorded for the original site boundary.

**1.16** Consequently, the effects recorded for Site Allocation Policy 3 (SAP3 – Dover Waterfront), the Publication Dover District Local Plan as a whole and in-combination effects with other plans policies and programmes set out in **Chapter 7** of the SA Report still stand.

**1.17** The correct policy-off effects for SA objectives 4 (Transport) and 8 (Climate change) for Aylesham sites AYL004 and AYL004r are set out in **Table 2**.

**Table 2: Corrections to the policy-off effects for site options AYL004 and AYL004r**

Site ID	SA4: Transport		SA8: Climate change	
	Incorrect effect	Correction	Incorrect effect	Correction
AYL004*	-	+	-	+
AYL004r*	+	-	+	-

**1.18** Sites AYL004 or AYL004r are not allocated in the Publication Local Plan, so no further changes are required in **Chapter 7**.

### Policy-on effects

**1.19** The revised site boundary (SAP3r) resulted in no changes to the policy-off effects recorded for the original SAP3 boundary, and no changes have been made to the wording of site allocation policy SAP3. Consequently, the effects recorded for site allocation policy SAP3 in **Chapter 7** of the SA Report still stand. **Table 2** shows effects of site allocation policy SAP3.

**Table 2: Comparison of SAP3 and SAP3r policy-on effects**

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
SAP3	+	--/+	++	+	-	-	-	+	--	-	+
SAP3r	+	--/+	++	+	-	-	-	+	--	-	+

LUC

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