

Dover District Council

**Draft Dover District Local
Plan (Reg 18)
Sustainability Appraisal**

Final report

Prepared by LUC
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Dover District Council

Dover District Local Plan 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 18 version of the Local Plan and should be read in conjunction with that document.

Dover District



1.3 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**).

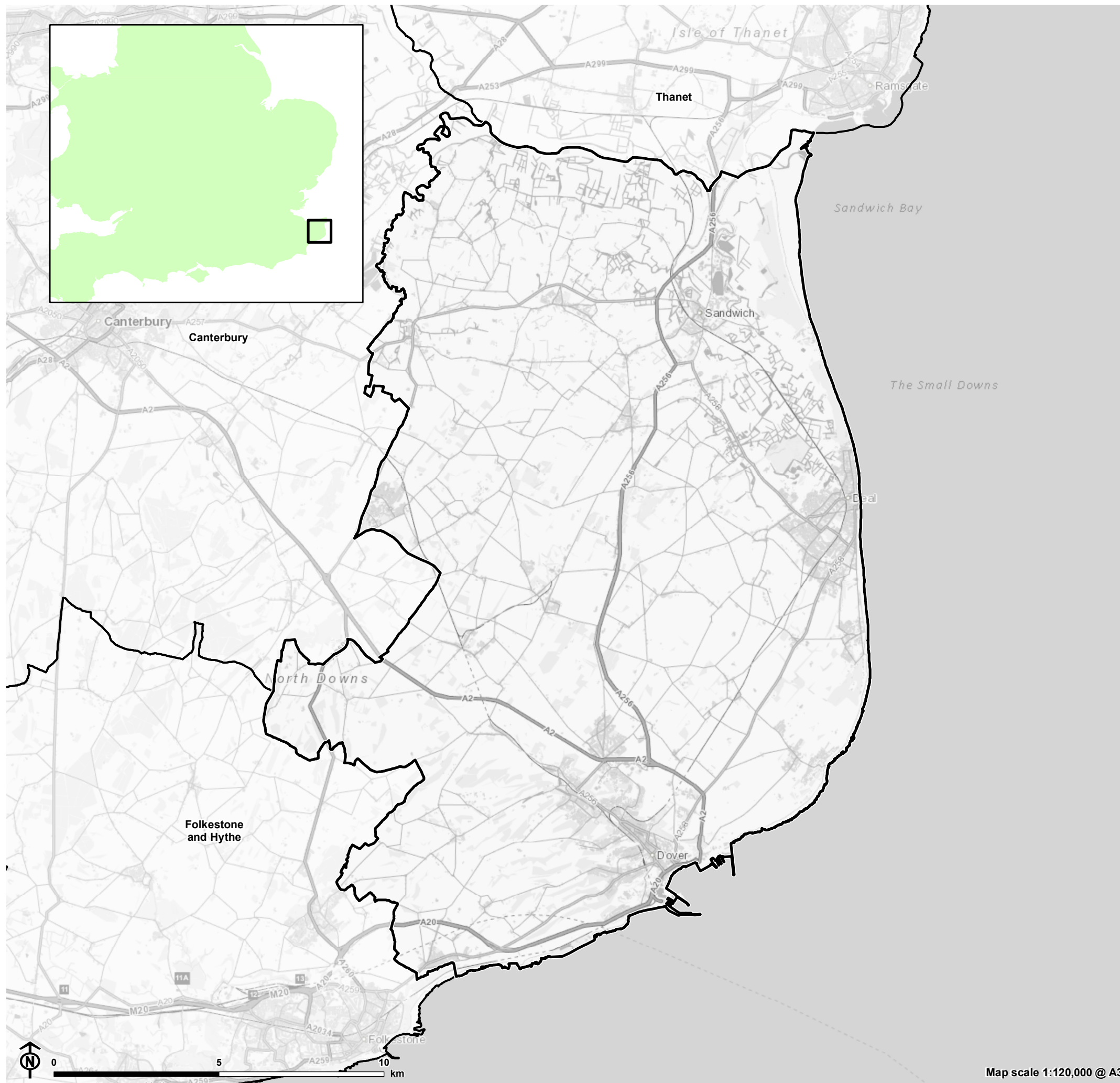
1.4 Dover's historic port is one of the UK's most important commercial gateways to and from continental Europe. The District is connected to the national trunk road network from both the M20/A20 route via Folkestone, Ashford and Maidstone and the M2/A2 route via Canterbury and Faversham. The District 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 Ashford to the west.

1.5 The District's rich maritime history has created a patchwork of contrasting landscapes, 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.

1.6 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. However, the adopted Core Strategy and Land Allocations Local Plan will go some way towards addressing many of the issues. In most cases, 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: Context

-  District boundary
-  Neighbouring district boundary



Dover District Local Plan

1.7 Dover District Council formally adopted its Core Strategy on 24th 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 28th 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.

1.8 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 a National Planning Policy Framework (NPPF) and Guidance (NPPG) in 2012, and which was subsequently updated in 2019. 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.

1.9 Consequently, the Council is in the process of updating its evidence base to support the Local Plan to 2040. The Local Plan document will include 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

1.10 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.

1.11 SEA is also a statutory assessment process, required under the SEA Directive¹, transposed in the UK by the SEA Regulations². 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)³. 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".

1.12 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 guidance⁴ 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

1.13 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.

¹ 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.

² 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).

³ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁴ See <https://www.gov.uk/government/collections/planning-practice-guidance>

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.	Chapters 1 and 3 and Appendix 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).	Chapters 4, 5 and 6 and Appendix C 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.	Chapter 6 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.	Chapters 5 and 6 and Appendix E of this SA Report.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17.	Appropriate monitoring indicators will be considered following the drafting and SA of the Submission Local Plan.

SEA Regulations requirements	Where covered in this report
j) a non-technical summary of the information provided under the above headings.	A separate non-technical summary document will be prepared to accompany the SA Report for the Proposed Submission version of the Local Plan.
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)).	Focussed 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 is taking place between January and March 2021. 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)	
Provision of information on the decision: 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: <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ 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 ■ the measures decided concerning monitoring. 	To be addressed after the Local Plan is adopted.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).	To be addressed after the Local Plan is adopted.
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.	This report has been produced in line with current guidance and good practice for SEA/SA and this table

SEA Regulations requirements	Where covered in this report
	demonstrates where the requirements of the SEA Regulations have been met.

Structure of this report

1.14 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** describe 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 Draft Local Plan.
- **Chapter 6** describes the results of the SA of the Draft Local Plan policy options included within the Draft Local Plan.
- **Chapter 7** 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, responds to each comment, referring to associated changes to the SA scope 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 SA findings generated through the SA of the 15 growth/spatial options considered through the plan-making process.
- **Appendix D** 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 E** sets out the Council's reasons for the selection of sites for allocation in light of the reasonable alternatives identified.

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 provide 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 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 to be 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 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, 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**.

Development 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 D** 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 Report⁵. This

⁵ This original scoping process is described in the SA Scoping Report prepared by LUC in February 2018.

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 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 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.

Identifying and appraising the options for the Reg 18 Local Plan

Growth and spatial options

2.24 The Council's first priority in the development of its new Local Plan has been 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**.

Site options

2.26 Following the SA of the growth and spatial options the Council's reasonable 134 residential, two gypsy and traveller and 24 employment site options were appraised against the SA framework.

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**.

Policy options

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

Appraisal methodology

2.29 Reasonable alternative options considered in the preparation of the Draft Local Plan have been appraised

against the SA objectives in the SA framework set out in **Chapter 3**.

2.30 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires 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 to date 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 effects, both positive and

negative, have been presented, 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 and 6** 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 **Chapter 6**.

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 Draft Local Plan and this accompanying SA Report. These documents are being published on the Council's website for consultation between January and March 2021. 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 will be considered following the drafting and SA of the Submission Local Plan.

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 D**. These assumptions were applied through the use of Geographical Information Systems (GIS) data.

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 residential site options effects on the District’s historic environment, landscapes and townscape drew of Council officer assessments that considered designated and non-designated assets. However, the same local assessments were not available for the two gypsy and traveller site options tested, or the employment site options tested through the SA. Consequently the gypsy and traveller and employment site options were subjected to a precautionary GIS-based assessment using the location of mapped historic and landscape sensitivities. These area-based assessments serve only to highlight the sites where adverse effects have the greatest chance of occurring based on presence of mapped datasets. This GIS analysis does not benefit from any supplementary judgements on the setting of assets or local data on local designations, undesignated assets and assets at risk.
- A 1% overlap concession has been applied to all relevant site assessment criteria set out in **Appendix D** 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 D** 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 generic messages relevant to the preparation of the Local Plan and the SA.
- 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 more recent, accurate and consistent evidence available.

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 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.

Key international plans, policies and programmes

3.5 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’) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging 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.

3.6 There are 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.

3.7 The UK has now left the EU and a transition period is now in place until 31st December 2020. During this period, all EU rules and regulations will continue to apply to the UK.

3.8 As set out in the Explanatory Memorandum accompanying the Brexit amendments⁶, the purpose of the Brexit amendments to the SEA Regs is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. As such, the documents presented in **Appendix B** include those at an EU level and will continue to do so until such time as they are superseded by national legislation.

Key national plans, policies and programmes

3.9 The most significant national policy context for the Local Plan is the National Planning Policy Framework (NPPF), which was originally published in 2012 and was subsequently updated in 2019⁷. The Local Plan must be consistent with the requirements of the NPPF, which states:

“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.”

3.10 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”.*

3.11 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.”*

3.12 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.*”

3.13 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.

3.14 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

3.15 The Localism Act (2011) sought to move decision-making away from central government and towards local communities.

⁶ Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232

⁷ Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

Part of this included the introduction of Neighbourhood Planning.

3.16 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."

3.17 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.

3.18 Seven Neighbourhood Plan Areas have been defined in Dover District:

- Ash
- Dover Town
- Langdon
- Sandwich
- Shepherdswell
- St Margaret's
- Worth

3.19 Worth Parish Council Neighbourhood Plan was adopted in 2014. The other Neighbourhood Plans are in the process of being prepared.

3.20 A more detailed review of the relevant documents is provided by topic heading in **Appendix B**. This includes a wide range of international agreements, EU Directives and national legislation.

Sustainability context

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

3.25 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

A. Population, health and wellbeing
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 to expedite 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. There are currently capacity issues within Dover town and Deal's existing primary schools. 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. Economy
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 in the A2 Corridor and 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
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
C. Transport connections and travel hubs
C1. Port-related congestion along the M20/A20, M2/A2 and A21 is resulting in seasonal 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.
D. Air, land and water quality
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 provides an opportunity to set out 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. 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.
E. Climate change adaptation and mitigation
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 any coastal flooding and help the District's communities adapt to the increased likelihood of significant weather events in the future.
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.
F. Biodiversity
F1. 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.
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 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.

The SA framework

3.26 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**).

3.27 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; landscape.

Table 3.2: Sustainability appraisal framework

SA objective	Appraisal questions: will the Plan/option lead to ... ?	Relevant key issue (see Table 3.1)	Relevant SEA topics
Population Growth, Health and Wellbeing			
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?	A1 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, wellbeing, 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, including those set out in the Kent and Medway Growth and Infrastructure Framework (GIF)?	A3, A4, A5, A6 and A7	Population, Human Health and Material Assets
Economy			
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? 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? 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? SA 3.5: Does the Plan support the prosperity and diversification of the District's rural economy? SA 3.6: Does the District have sufficient education facilities to help provide the working population the District's existing and future employer needs?	B1, B2 and B3	Population, Human Health and Material Assets
SA4: To reduce the need to travel and encourage sustainable and	SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complimentary mix of land uses?	C1 and C2	Air, Climatic Factors, Population and Human Health

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SA objective	Appraisal questions: will the Plan/option lead to ... ?	Relevant key issue (see Table 3.1)	Relevant SEA topics
active alternatives to road vehicles to reduce congestion.	SA 4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks? SA 4.3: Does the Plan facilitate working from home and remote working? SA4.4: Does the Plan help to address road congestion, particularly congestion related to Port activity?		
Air, Land and Water Quality			
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.	SA 5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land? SA 5.2: Does the Plan prioritise development of poorer quality agricultural land of the District's best and most versatile agricultural land? SA 5.3: Does the Plan minimise development in mineral safeguarding areas? SA 5.4: Does the Plan direct inappropriate development away from source protection zones? SA 5.5: Does the Plan minimise water use? 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? SA 5.7: Does the Plan encourage the reuse and sourcing of local materials? SA 5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?	D1, D2, D4, D5 and D6	Soil, Water, Biodiversity, Human Health, Fauna and Flora and Landscape
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
Climate Change Adaptation and Mitigation			
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 objective	Appraisal questions: will the Plan/option lead to ... ?	Relevant key issue (see Table 3.1)	Relevant SEA topics
Biodiversity			
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 the use of electric cars and sustainable modes of transport?	E4	Water, Soil, Climatic Factors and Human Health
SA 9: To conserve, connect and enhance the District's wildlife habitats and species.	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? 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? SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?	F1 and F2	Biodiversity, Flora and Fauna and Landscape
Historic Environment			
SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	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? 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? 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?	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.	SA 11.1: Does the Plan protect the District's sensitive and special landscapes, seascapes and townscapes? 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?	H1	Landscape, Cultural Heritage, Biodiversity, Flora and Fauna

Chapter 4

SA 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 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 at this stage, 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.

Growth option considerations

4.6 The Dover Local Plan will need to 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 over 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 The minimum requirement for housing need in the District has been 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 local Plan period 2020 to 2040. A 10% buffer (1,192 dwellings) has been added to this total to provide the necessary flexibility to ensure the District's minimum housing needs are delivered within the Plan period.⁸ The final housing target for the Local Plan is subject to change up until the Local Plan is adopted, until the methodology for calculation need is finalised.

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 windfalls⁹. Commitments are sites with existing planning permission, both major and minor. As of 1st April 2020 there were 4,408 extant permissions.

4.10 Taken together, the total residual housing requirement that the Plan needs to deliver over the Plan period through the allocation of sites and windfall development is 8704 dwellings (rounded down to 8,700).

Maximum capacity to deliver housing over the Plan period

4.11 Dover District Council has yet to rule out the possibility of planning for more housing growth than the minimum that is currently needed locally. 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.

4.12 At present there have been no requests for Dover to accommodate growth from neighbouring or other authorities, but it cannot be ruled out at this stage in the plan-making process.

4.13 In the absence of any clear metric on how much additional housing growth Dover District may wish, or be called upon to, accommodate over the Plan period, the total capacity of the District's known and suitable housing sites has been calculated. The District's draft Housing and Economic Land Availability Assessment¹⁰ (HELAA) published in April

⁸ 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.

⁹ 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.

¹⁰ Dover Housing and Economic Land Availability Assessment, Dover District Council, 2020

2020 identified 114 'suitable' sites (with capacity for 11,596 dwellings) and 12 'potentially suitable' sites (with capacity for 515 dwellings). Therefore, the Local Plan 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 has a total theoretical capacity to deliver 13,301 dwellings over the Plan period.

4.14 At this stage in the plan-making process, the deliverability of all suitable and potentially suitable sites has yet to be established. While the delivery of all 12,111 dwellings across all 126 sites may prove difficult given past delivery rates, this is not a reason to discount this level of housing growth at this stage.

Minimum employment land need over the Plan period

4.15 The adopted District Plan allocates approximately 227,450m² of employment floorspace for offices, research and development and light industrial processes (hereafter referred to as E use class)¹¹; however, approximately 98,756m² of this allocated employment land has yet to be taken-up and permitted for development. The District's Economic Development Needs Assessment (EDNA)¹² estimates a total job growth of 2,700 jobs between 2017 and 2037. Translated into a E use class land area over the Local Plan period this equates to a negative requirement in allocated E use class floorspace of -1,680m². 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.

4.16 The District is in the process 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 this updated evidence, it is 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.

Maximum capacity to deliver employment land over the Plan period

4.17 For the same reasons outlined for housing above, Dover District Council has not ruled out the possibility of planning for more employment growth than is currently needed locally.

4.18 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. The District's Employment Land Review (ELR) identifies 4 'suitable' sites (94,688m²) and 9 'potentially suitable' sites (43,550m²). Therefore, the Local Plan could theoretically allocate up to 13 new/expanded sites with a total capacity to accommodate 138,238m² of E use class employment land.

4.19 At this stage in the plan-making process, the deliverability of all suitable and potentially suitable sites has yet to be established. While the delivery of all 138,238m² may prove difficult given past delivery rates, this is not a reason to discount this level of employment growth at this stage.

Reasonable growth options

4.20 In light of the above evidence and policy considerations, three potential scales of growth have been identified for further consideration and appraisal at this stage:

- **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 (138,238m²).
- **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 (138,238m²).

4.21 These identified growth options may need to be supplemented with other reasonable options at a later stage in the plan-making process, in light of new evidence.

¹¹ 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 1st September 2020.

¹² Dover Economic Development Needs Assessment, Litchfields, 2017

Growth options discounted as unreasonable

4.22 Given the new Dover Local Plan is at an early stage of development, a relatively precautionary and 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, at this stage, the District's current 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.

4.23 Similarly, planning for scales of growth higher than the District's known capacity have been discounted as undeliverable until such time as suitable strategic locations/sites for growth are identified.

Spatial option considerations

4.24 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:

- 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.

4.25 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.

4.26 To date, this has led to the definition of five reasonable spatial options, set out and appraised below.

Reasonable spatial options

4.27 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) have been identified for further consideration and appraisal at this stage:

- **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 required¹³).
- **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.
- **Spatial Option E:** Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

4.28 These identified spatial options may need to be supplemented with other reasonable options at a later stage in the plan-making process, in light of new evidence.

¹³ Suitable sites prioritised over potentially suitable sites for growth option 1.

4.29 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 subjected to SA.

4.30 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.
- 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.

4.31 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 138,238m² 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.

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

Spatial Option A (suitable sites)

4.33 Spatial Option A distributes development to the locations where site options have already been promoted and found to be suitable or potentially suitable through the District's HELAA and ELR. The greater the scale of growth to be delivered the greater the number of sites that will need to be allocated.

4.34 To meet the District's minimum housing need over the Plan period (required under Growth Options 1 and 2), sites able to accommodate an additional 8,700 dwellings will need to be allocated. The capacity of the sites found to be suitable

through the District's HELAA equals 8,948 dwellings, just enough to meet the District's minimum additional allocation needs, which is therefore used for this option to avoid discounting sites at this stage of the process. These sites are distributed as follows:

- 76% of the sites are located in and around Dover.
- 5% of the sites are located in and around Deal.
- 2% of the sites are located in and around Sandwich.
- Less than 1% is recorded on sites in and around Aylesham.
- The remaining 17% of the sites are distributed amongst the District's many rural village, 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.

4.35 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 are distributed as follows:

- 56% of the sites are located in and around Dover.
- 5% of the sites are located in and around Deal.
- 4% of the sites are located in and around Sandwich.
- 10% of the sites are located in and around Aylesham.
- The remaining 25% of the sites are 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.

4.36 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 through the District's ELR equals 138,238m² of employment land. These sites are distributed as follows:

- 68% of the sites, able to accommodate roughly 94,506m² of employment land, are located in and around Dover.
- 4% of the sites, able to accommodate roughly 5,832m², are located in and around Sandwich.
- 24% of the sites, able to accommodate roughly 33,500m², are located in and around Aylesham.
- 2% of the sites, able to accommodate roughly 2,600m², are located in and around Eastry.
- 1% of the sites, able to accommodate roughly 1,800m², are located in and around Ringwould.

4.37 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 at this early stage in the plan-making process.

Spatial Option B (population based)

4.38 Spatial Option B distributes the growth options proportionately amongst the District's existing settlements based on their population. Census data from 2011¹⁴ has been used to determine the populations 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.

4.39 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

¹⁴ 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.

- 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
- 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 C (settlement hierarchy)

4.40 Spatial Option C distributes the growth options proportionately amongst the District's existing settlements based on their position in the District's established Settlement Hierarchy. 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.

4.41 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:

Spatial Option D (adopted plan Dover focus)

4.42 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, with the remainder being split across Deal, Sandwich, Aylesham, and the higher tier settlements in the rural area.

4.43 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.

4.44 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 at this early stage in the plan-making process.

4.45 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)

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

4.47 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.

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

4.49 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 Shepherdsweil
- 1% to St Margaret's
- East Stourmouth
- Tilmanstone
- 1% to Wingham
- Wingham Green
- Woodnesborough
- Worth

Spatial options discounted as unreasonable

4.50 Spatial options including the allocation of a new settlement have been raised and discussed during the Council's early Local Plan workshops. Options to allocate a new settlement in the Local Plan have been discounted at this stage 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 and assessed through the HELAA that are large enough to be considered new settlements in their own right.
- 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.

4.51 Consideration of the need for a new settlement will be explored in more detail when planning for the next Plan period and/or working with neighbours to meet wider County needs.

Approach to the SA of the growth and spatial options

4.52 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.

4.53 The full range of reasonable growth and spatial options identified at this stage and how they relate to one another are set out in **Table 4.1**. There are 15 combined growth/spatial options in total.

4.54 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 is 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.

4.55 The likely effects of the 15 options are presented by SA objective. The SA of each option against each SA objective has been 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**. The appraisal commentary in **Appendix C** is followed by **Figures C1 to C15** 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 highlight the main sustainability and strategic planning issues considered in the SA of the 15 options.

4.56 These maps have been 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.

4.57 Together these two datasets offer 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.

4.58 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.

4.59 The remainder of this chapter summarises the judgements drawn out in **Appendix D** 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

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 ¹⁵ dwellings distributed by the location of the District's suitable HELAA sites. (See Figure C.1 in Appendix C)	8,948 ¹⁵ dwellings + 138,238m ² of employment land distributed by the location of the District's suitable HELAA sites and suitable and potentially suitable ELR sites. (See Figure C.2 in Appendix C)	12,111 dwellings + 138,238m ² of employment land distributed by the location of the District's suitable and potentially suitable HELAA and ELR sites. (See Figure C.3 in Appendix C)
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. (See Figure C.4 in Appendix C)	8,700 dwellings + 138,238m ² of employment growth distributed by each existing settlement's population. (See Figure C.5 in Appendix C)	12,111 dwellings + 138,238m ² of employment growth distributed by each existing settlement's population. (See Figure C.6 in Appendix C)
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. (See Figure C.7 in Appendix C)	8,700 dwellings + 138,238m ² of employment growth distributed by the District's Settlement Hierarchy. See Figure C.8 in Appendix C)	12,111 dwellings + 138,238m ² of employment growth distributed by the District's Settlement Hierarchy. (See Figure C.9 in Appendix C)
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. (See Figure C.10 in Appendix C)	8,700 dwellings + 138,238m ² of employment growth distributed consistently with the adopted spatial strategy. (See Figure C.11 in Appendix C)	12,111 dwellings + 138,238m ² of employment growth distributed consistently with the adopted spatial strategy. (See Figure C.12 in Appendix C)
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. (See Figure C.13 in Appendix C)	8,700 dwellings + 138,238m ² of employment growth distributed more evenly across the District's settlements: Dover, Deal, Sandwich and Aylesham, and the rural villages. (See Figure C.14 in Appendix C)	12,111 dwellings + 138,238m ² of employment growth distributed more evenly across the District's settlements: Dover, Deal, Sandwich and Aylesham, and the rural villages. (See Figure C.15 in Appendix C)

¹⁵ 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 (8,949 dwellings), while the other options under these two growth scenarios reference the District's rough housing need (8,700 dwellings). 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.

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: Adopt- ed 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 effects likely			++/-- Mixed significant effects likely		

4.60 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 neighbour 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.

4.61 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. House prices in Deal are notably cheaper than Sandwich but are still more expensive than Dover town. 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.

4.62 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.

4.63 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

4.64 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.

4.65 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, wellbeing, 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: Adopt- ed 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 effects likely	++/-- Mixed significant effects likely		--/+ Mixed significant negative and minor positive effects likely		

4.66 The highest concentration of services and facilities in the District is provided in and around Dover town. This includes a number of higher or further 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.

4.67 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 a number of 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

4.68 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.

4.69 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: Adopt- ed 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 effects likely	++/-- Mixed significant effects likely			--/+ Mixed significant negative and minor positive effects likely	

4.70 The settlements of Dover and Sandwich¹⁶ 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 the Deal, this settlement provides access to a relatively limited number of job opportunities, with many residents commuting to other settlements such as Sandwich. 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

4.71 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.

4.72 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).

¹⁶ 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: Adopt- ed 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 effects likely		++/-- Mixed significant effects likely		--/+ Mixed significant negative and minor positive effects likely	

4.73 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.

4.74 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

4.75 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.

4.76 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: Adopt- ed 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					
-- Significant negative effect likely					

4.77 The District is covered by a number of water Source Protection Zones (SPZs) covering the District north of Dover to Deal and Sheperdswell, 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. 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.

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.

4.79 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 objective 5 conclusions

4.78 The options are considered to generate relatively similar significant adverse effects against SA objective 5. All spatial

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: Adopt- ed 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 effects likely		++/-- Mixed minor or significant effects likely		--/+ Mixed significant negative and minor positive effects likely	

4.80 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 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.

4.81 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

4.82 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.

4.83 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 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 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: Adopt- ed 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					
-- Significant negative effect likely			- Minor negative effect likely		

4.84 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.

4.85 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

4.86 The options that perform best against SA objective 7 are those that focus growth around Dover 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.

4.87 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: Adopt- ed 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 effects likely	++/-- Mixed significant effects likely			--/+ Mixed significant negative and minor positive effects likely	

4.88 Delivering new homes in Dover District over 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 resident and worker's 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.

4.89 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

4.90 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.

4.91 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: Adopt- ed 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					
--					
Significant negative effect likely					

4.92 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.

4.93 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

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

4.95 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.

4.96 The options that perform the least well against SA objective 7 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: Adopt-ed 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					
--					
Significant negative effect likely					

4.97 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.

4.98 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

4.99 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: Adopt-ed 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					
--			-		
Significant negative effect likely			Minor negative effect likely		

4.100 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 Sheperdswell. 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.

4.101 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

4.102 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.

4.103 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

4.104 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.

4.105 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.

4.106 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 (travel), 6 (air pollution) and 8 (climate change mitigation). Beyond Deal the benefits of new employment land would most likely be maximised in Dover town, considering the stronger sustainable links at this location.

4.107 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 (travel), 5 (natural resources), 6 (air pollution), 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape).

4.108 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 (natural resources), 7 (climate change adaptation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape). 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.

4.109 Until the detailed location and provisions of all site allocations are known, significant adverse effects cannot be ruled out.

Best performing growth and spatial options

4.110 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.

4.111 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.

4.112 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

4.113 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 (travel), 6 (air pollution) and 8 (climate change mitigation). 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 (natural 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 and townscape).

4.114 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 (climate change adaptation) 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 (travel), 5 (natural resources), 6 (air pollution), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape).

Table 4.2 Summary of likely sustainability effects of 15 growth/spatial options

Growth and Spatial Options / SA Objectives	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 wellbeing	++/-	++/-	++/-	--/+	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	--/+	--/+	--/+
SA3: Employment	--/+	++/-	++/-	--/+	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	--/+	--/+	--/+
SA4: Travel	--/+	++/-	--/+	--/+	--/+	--/+	++/-	++/-	++/-	++/-	++/-	++/-	--/+	--/+	--/+
SA5: Natural resources	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SA6: Air pollution	--/+	--/+	--/+	+/-	+/-	--/+	++/-	++/-	++/-	++/-	++/-	++/-	--/+	--/+	--/+
SA7: Climate change adaptation	--?	--?	--?	--	--	--	--	--	--	-?	-?	-?	--	--	--
SA8: Climate change mitigation	--/+	++/-	--/+	--/+	--/+	--/+	++/-	++/-	++/-	++/-	++/-	++/-	--/+	--/+	--/+
SA9: Biodiversity	--?	--?	--	--	--	--	--	--	--	--?	--?	--	--	--	--
SA10: Historic environment	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA11: Landscape and townscape	--?	--?	--?	--?	--?	--?	--?	--?	--?	-?	-?	--?	--?	--?	--?
Key	-- Significant negative effect likely			++/- Mixed significant positive and minor negative effects likely			--/+ Mixed significant negative and minor positive effects likely			+/- or ++/- Mixed minor or significant effects likely			- Minor negative effect likely		

Chapter 5

SA 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 D**. The options presented and appraised were defined based on data and evidence available in July 2020.

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 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 zones¹⁷;
- subject to planning permission (to avoid double counting housing supply);
- under construction or since built; and/or
- contrary to the policies in the NPPF, for example isolated development in the open countryside with no relationship to established settlements.

5.5 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.

5.6 The suitability assessment determined:

- 93 sites, as suitable¹⁸;
- 41 sites, as potentially suitable¹⁹; and
- 197 sites, as unsuitable²⁰.

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

5.8 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 available²¹;
- 12 sites, as potentially available²²; and
- 8 sites, as unavailable²³.

5.9 The draft HELAA (April 2020) process concluded that the 126 sites, with a capacity to accommodate 12,111 dwellings, are 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.

5.10 Further details on the Council's HELAA process can be found in the Council's HELAA Report (December 2020).

Employment site options

5.11 Options for allocating further land for employment development are currently limited. However, there is still some remaining development potential on existing allocations, which can be rolled forward into the new draft Local Plan. In the absence of other known reasonable employment site options, the Council has reviewed and subjected the 24 known existing employment sites in the District to SA to evaluate their potential for reallocation in the Draft Local Plan.

5.12 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.

5.13 Given further land is likely to be required to deliver the Council's Economic Strategy, the Council is carrying 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 will be considered and subjected to SA as part of the drafting of the next iteration of the Local Plan.

Gypsy and traveller site options

5.14 The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arch4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover

¹⁷ At this stage, sites which were partly covered by these designations were taken forward for further assessment.

¹⁸ 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.'

¹⁹ 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.'

²⁰ 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.'

²¹ 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.'

²² 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.'

²³ 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.'

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, 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.

5.15 The assessment drew on site analysis undertaken by arch4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

5.16 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.

5.17 The two remaining sites were assessed as being potentially suitable and where there subjected to SA.

Approach to appraisal

5.18 Each residential and gypsy and traveller site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table D1 in Appendix D**. Each employment site option was appraised using the detailed assessment criteria and associated assumptions outlined in **Table D2 in Appendix D**.

5.19 It is recognised that in some cases site promoters have specified the location of development within promoted sites 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 sites redline boundary and the Council's most up-to-date evidence base.

5.20 The residential site option appraisals benefit from Council officer assessment of national and local landscape and historic environment sensitivities, but these assessments were not available for the gypsy and traveller and employment site options. Consequently, the gypsy and traveller and employment site options were subjected to a precautionary GIS-based assessment using the location of mapped historic and landscape sensitivities. The limitations of this approach and other difficulties and limitations encountered through the SA are detailed in **Chapter 2**; however, it should be noted that the significant effects of the Local Plan, including its preferred site allocations, will be appraised again as part of the SA of the Proposed Submission Local Plan. This SA work will draw on the Council's latest evidence base.

5.21 The appraisal of site options against SA objective 2 (Health and Wellbeing) has been split in two to draw the notable distinction between the relative health and wellbeing 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 wellbeing of residents and workers (2b).

Residential site option SA findings

5.22 All the residential site options are illustrated in **Figure 5.1**.

5.23 **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:

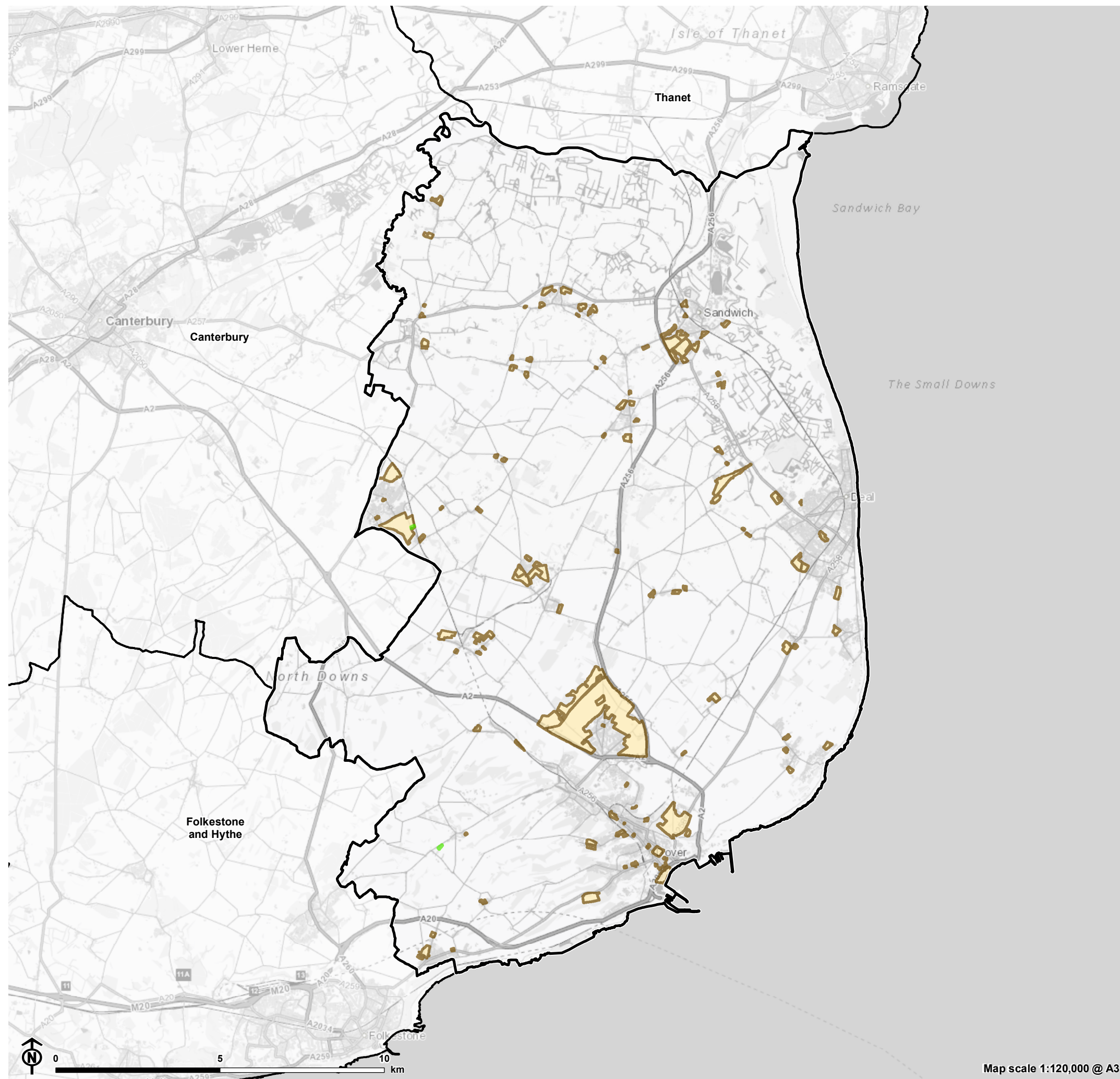
- **Table 5.1** illustrates the effects of the reasonable site options in and around the District's only regional centre: **Dover**. The table also includes the site options in and around the village of **Whitfield**, which lies particularly close to Dover.
- **Table 5.2** illustrates the effects of 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**.
- **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**).





5.24 The site options 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.

5.25 The site options that have been selected for allocation in the Draft Local Plan are highlighted in **bold**. The Council's reasoning for the selection of the preferred site options over

the reasonable alternatives is set out at the end of this chapter.

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

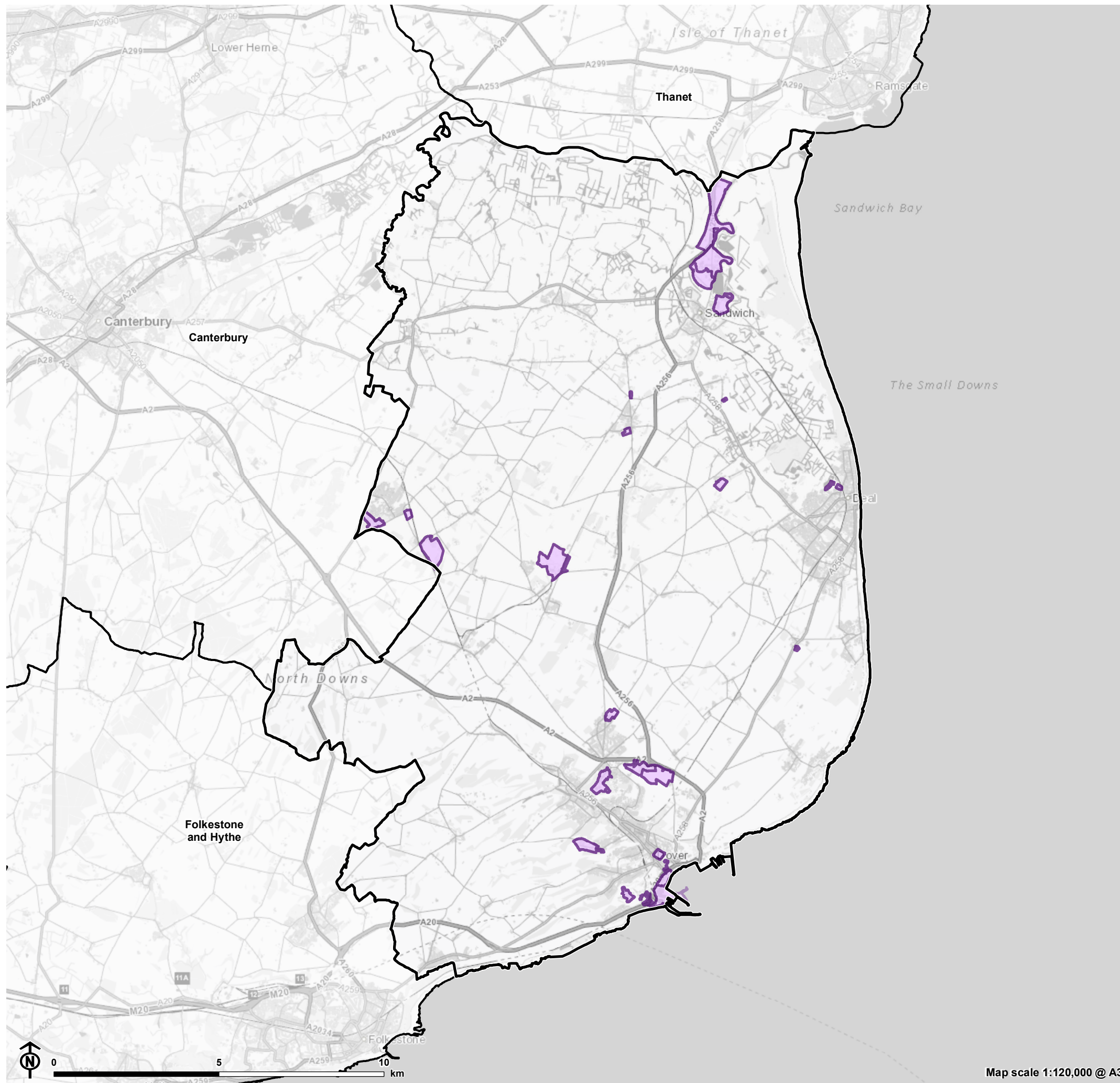


Table 5.1 Dover (including Whitfield) residential site options SA findings

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												
DOV019	+	++	-	+	++	0	0?	0	++	-	-?	0?
DOV030	+	++	-	+	++	0	0?	0	++	-	-?	0?
DOV021	+	++	--	+	++	0	0?	0	++	-	-?	0?
DOV032	+	++	-	+	++	-	0?	--	++	0	-?	0?
DOV007	+	++	-	+	++	-	0?	--	++	-	-?	0?
DOV018	+	++	--	+	++	-	0?	--	++	0	-?	0?
DOV028	+	++	--	+	++	-	0?	--	++	0		0?
DOV022B	+	+	-	+	+	0	0?	-	+	-	0?	0?
DOV022E	+	+	0	+	+	-	0?	-	+	-	0?	0?
DOV010	+	+	0	+	+	--	0?	0	+	0	0?	0?
DOV017	+	++	--	+	++	-	0?	--	++	--	-?	0?
DOV009	+	+	0	+	+	--	0?	0	+	-	-?	0?
DOV006	+	+	0	+	+	-	0?	-	+	--	-?	0?
DOV025	+	0	0	+	+	-	0?	-	+	--	0?	-?
DOV022C	+	+	0	+	+	--	0?	--	+	-	0?	0?
DOV026	+	+	0	+	+	--	0?	--	+	-	0?	0?
DOV029	+	+	0	+	+	-	0?	--	+	--	0?	0?
DOV008	+	-	0	+	-	-	0?	0	-	-	0?	0?
DOV022A	+	+	--	+	+	--	0?	-	+	-	0?	0?
DOV035	+	+	--	+	+	-	0?	--	+	0	-?	0?
DOV023	+	+	--	+	+	-	0?	--	+	-	-?	0?
DOV012	+	-	0	+	-	-	0?	--	-	--	-?	0?
GUS001	+	-	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									
GUS002	+	+	--	+	+	--	0?	--	+	--	-?	-?
Whitfield												
WHI006	+	0	0	+	+	-	0?	-	+	0	0?	0?
WHI007	+	-	0	+	-	--	0?	--	-	0	-?	0?
WHI008	+	+	--	+	+	--	0?	--	+	--	-?	0?
WHI003	+	-	0	+	--	--	0?	0	--	0	-?	0?
WHI004	+	-	-	+	--	--	0?	0	--	0	-?	0?
WHI002	+	-	-	+	--	--	0?	0	--	-	-?	0?
WHI005	+	--	0	+	--	--	0?	0	--	-	-?	0?
WHI001	+	-	--	+	-	--	0?	--	-	--	-?	0?
Key	-- Significant negative effect likely			++ Significant positive effect likely		- Minor negative effect likely			+ Minor positive effect likely		0 Negligible effect likely	

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									
DEA018	+	+	0	+	+	-	0?	0	+	-	-?	0?
DEA021	+	+	0	+	+	0	0?	--	+	-	-?	0?
DEA020	+	-	0	+	+	--	0?	-	+	0	-?	0?
SHO002	+	0	--	+	+	--	0?	-	+	-	-?	0?
DEA008	+	-	0	+	-	--	0?	0	-	-	-?	0?
SHO004	+	-	--	+	0	--	0?	0	0	-	-?	0?
WAL002	+	-	0	+	-	-	0?	--	-	-	-?	-?
Key	-- Significant negative effect likely			- Minor negative effect likely			+ Minor positive effect likely			0 Negligible effect likely		

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												
AYL001	+	+	0	+	+	--	0?	0	+	0	-?	0?
AYL005	+	-	0	+	+	-	0?	0	+	--	-?	-?
AYL002	+	-	0	+	0	--	0?	0	0	-	-?	-?
AYL004	+	0	0	+	+	--	0?	--	+	-	-?	-?
AYL003	+	+	0	+	+	--	0?	--	+	--	-?	-?
Sandwich												
SAN008	+	+	0	+	+	0	0?	--	+	-	-?	-?
SAN006	+	+	0	+	+	0	0?	--	+	--	-?	-?
SAN013	+	+	0	+	+	--	0?	--	+	-	-?	0?
SAN015	+	+	0	+	+	--	0?	--	+	-	0?	-?
SAN007	+	+	0	+	+	--	0?	--	+	-	-?	-?
SAN023	+	+	0	+	+	--	0?	--	+	-	-?	-?
SAN024	+	+	--	+	+	--	0?	0	+	-	-?	-?
SAN016	+	0	--	+	+	--	0?	0	+	-	-?	-?
SAN019	+	-	--	+	0	--	0?	--	0	-	-?	0?
SAN010	+	-	--	+	-	--	0?	--	-	-	0?	-?
Key	-- Significant negative effect likely			- Minor negative effect likely			+ Minor positive effect likely			0 Negligible effect likely		

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?
ASH004	+	-	--	+	-	--	0?	--	-	0	-?	-?
ASH008	+	-	--	+	-	--	0?	--	-	0	-?	-?
ASH010	+	-	0	+	-	--	0?	--	-	--	-?	-?
Eastry												
EAS011	+	-	0	+	-	-	0?	0	-	0	-?	0?
EAS002	+	-	0	+	-	-	0?	-	-	-	-?	-?
EAS007	+	-	0	+	-	--	0?	0	-	0	-?	-?
EAS009	+	-	0	+	-	--	0?	--	-	-	-?	0?
EAS012	+	-	0	+	-	--	0?	--	-	-	-?	0?
Elvington												
EYT008	+	0	0	+	+	-	0?	0	+	0	-?	0?
EYT015	+	0	0	+	+	-	0?	0	+	0	-?	-?
EYT012	+	-	0	+	0	-	0?	0	0	0	-?	0?
EYT003	+	-	0	+	+	--	0?	0	+	0	-?	0?
EYT004	+	+	0	+	+	--	0?	--	+	0	-?	-?
EYT002	+	-	0	+	-	-	0?	0	-	0	-?	-?
EYT009	+	0	0	+	+	--	0?	--	+	--	-?	0?
Eythorne												

Chapter 5

SA of site options

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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									
EYT019	+	-	0	+	+	--	0?	0	+	0	-?	0?
EYT001	+	-	0	+	-	--	0?	--	-	0	0?	0?
Shepherdswell with Coldred												
SHE008	+	0	0	+	+	-	0?	0	+	0	-?	0?
SHE001	+	-	0	+	+	-	0?	0	+	0	-?	-?
SHE004	+	-	0	+	0	-	0?	0	0	-	-?	-?
SHE006	+	-	0	+	0	--	0?	--	0	0	-?	0?
SHE003	+	-	0	+	-	--	0?	--	-	-	-?	-?
St Margret's at Cliffe												
STM010	+	-	0	+	-	-	0?	0	-	-	-?	-?
STM011	+	-	0	+	-	-	0?	0	-	-	-?	-?
STM003	+	-	0	+	-	--	0?	0	-	-	0?	0?
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?
WIN014	+	-	--	+	-	--	0?	0	-	0	0?	-?
WIN004	+	-	0	+	-	--	0?	-	-	--	-?	0?
WIN006	+	-	--	+	-	--	0?	0	-	0	-?	-?
Key	-- Significant negative effect likely			- Minor negative effect likely			+ Minor positive effect likely			0 Negligible effect likely		

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												
ALK003	+	-	0	+	-	--	0?	--	-	0	0?	0?
Capel le Ferne												
CAP009	+	-	0	+	-	--	0?	0	-	0	-?	0?
CAP013	+	-	0	+	-	--	0?	0	-	0	-?	0?
CAP011	+	-	0	+	-	--	0?	-	-	-	-?	-?
CAP006	+	-	0	+	-	--	0?	--	-	-	-?	0?
Chillenden												
GOO007	+	-	0	+	-	--	0?	0	-	0	-?	-?
GOO006	+	-	0	+	-	--	0?	--	-	0	--?	0?
East Langdon												
LAN003	+	-	0	+	-	--	0?	0	-	0	-?	0?
East Studdall												
SUT002	+	-	0	+	-	--	0?	0	-	0	-?	0?
SUT009	+	-	0	+	-	--	0?	0	-	0	-?	0?
Finglesham												
NOR001	+	-	0	+	-	--	0?	0	-	-	-?	-?
NOR003	+	-	0	+	-	--	0?	--	-	-	-?	0?
Great Mongeham												
GTM003	+	-	0	+	-	--	0?	0	-	0	-?	0?
Kingsdown												
KIN002	+	-	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									
Lydden												
LYD003	+	+	0	+	+	--	0?	--	+	0	-?	0?
LYD001	+	-	0	+	-	-	0?	--	-	-	-?	-?
Nonington												
NON004	+	-	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												
PRE003	+	-	0	+	-	--	0?	0	-	-	0?	0?
PRE016	+	-	0	+	-	--	0?	0	-	-	0?	0?
PRE001	+	-	0	+	-	--	0?	0	-	--	0?	-?
PRE017	+	-	0	+	-	--	0?	--	-	-	0?	0?
PRE007	+	-	0	+	-	--	0?	--	-	-	-?	-?
Ringwould												
RIN002	+	-	--	+	-	--	0?	0	-	0	-?	0?
RIN004	+	-	--	+	-	--	0?	0	-	0	-?	0?
RIN003	+	--	--	+	-	--	0?	-	-	-	-?	0?
Staple												
STA010	+	-	0	+	-	--	0?	--	-	0	0?	0?
STA004	+	-	0	+	-	--	0?	0	-	0	--?	-?
STA003	+	--	0	+	-	--	0?	--	-	0	0?	-?
STA008	+	--	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									
STA009	+	-	0	+	-	--	0?	--	-	0	--?	0?
Tilmanstone												
TIL001	+	-	--	+	-	-	0?	0	-	0	-?	0?
West Hougham												
HOU004	+	-	0	+	-	--	0?	0	-	0	0?	0?
Woodnesborough												
WOO002	+	-	0	+	-	--	0?	0	-	0	0?	0?
WOO005	+	-	0	+	-	--	0?	0	-	0	0?	0?
WOO006	+	-	0	+	-	--	0?	0	-	-	-?	0?
WOO007	+	--	0	+	-	--	0?	0	-	0	-?	0?
Worth												
WOR007	+	-	0	+	-	--	0?	0	-	-	-?	0?
WOR009	+	-	0	+	-	--	0?	0	-	-	-?	0?
WOR006	+	-	0	+	-	--	0?	--	-	-	0?	0?
Key	-- Significant negative effect likely			- Minor negative effect likely			+ Minor positive effect likely			0 Negligible effect likely		

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												
Land to the south of Alkham Valley Road	+	--	0	+	-	--	0?	--	-	-	--?	--?
Aylesham												
Land to the North of Snowdown Caravan Site	+	0	0	+	+	-	0?	0	+	0	-?	-?
Key	-- Significant negative effect likely			- Minor negative effect likely			+ Minor positive effect likely			0 Negligible effect likely		

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	0	+	0	+	++	--	0?	0	++	-	-?	-?
19 – Aylesham Industrial Estate	-	0	+	+	--	0	0?	+	--	-?	-?	-
Deal												
11 – Albert Road	0	++	0	+	++	0	0?	--	++	--	-?	0?
10 – Deal Business Park	0	+	0	+	+	0	0?	--	+	--	-?	0?
Dover												
23 – The Citadel	0	++	-	+	++	0	0?	0	++	--	--?	-?
21 - Midtown	0	+	-	+	++	-	0?	--	++	-	--?	0?
17 – A20 Sites	0	++	--	+	++	0	0?	--	++	--	--?	0?
22 – Carparks off Castle and Church Street	0	+	-	+	+	-	0?	--	+	--	--?	0?
9 – Western Docks	0	+	--	+	+	-	0?	--	+	--	--?	0?
8 - Barwick Road	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									
Industrial Estate												
18 – Dover Waterfront	0	+	--	+	+	-	0?	--	+	--	--?	0?
Eastry												
15 – Land East of Foxborough Hill	0	-	0	+	-	--	0?	0	-	-	--?	0?
24 – Eastry Hospital	0	-	0	+	-	--	0?	--	-	-	--?	0?
Elvington / Eythorne												
5 – Pike Road Industrial Estate	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	-	--?	--?
Sandwich												
3 – Sandwich Industrial Estate	0	++	0	+	++	--	0?	--	++	--	--?	0?

Chapter 5

SA of site options

Draft Dover District Local Plan (Reg 18) Sustainability Appraisal
December 2020

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									
2 – Discovery Park	0	++	0	+	+	--	0?	--	+	--	--?	0?
1 – Ramsgate Road	0	-	0	+	-	-	0?	--	-	--	--?	0?
Snowdown												
14 – Land off Holt Street	0	0	--	+	+	--	0?	-	+	--	--?	-?
Whitfield												
12 – Land to East of Sandwich Road	0	+	0	+	+	--	0?	--	+	-	-?	0?
20 – Port Zone	0	-	0	+	+	-	0?	--	+	--	0?	0?
7 – White Cliffs Business Park	0	+	0	+	+	--	0?	--	+	--	0?	0?
Worth												
13 – The Worth Centre	0	-	0	+	-	--	0?	--	-	--	--?	0?
Key	--			-			+			0		
	Significant negative effect likely			Minor negative effect likely			Minor positive effect likely			Negligible effect likely		

Dover residential site option SA findings

5.26 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 DOV030 close to the centre of the town.

5.27 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 (in combination with previously allocated WHI008) and GUS002 in the open countryside to the north and north east, respectively.

5.28 Of the 32 site options within and around Dover (including Guston) and Whitfield, 19 have been allocated in the Draft Local Plan. The Council's reasoning for this is set out at the end of this chapter. 13 of the 18 most strongly performing site options have been selected for allocation: DOV019, DOV030, DOV018, DOV028, DOV022B, DOV022E, WHI006, DOV009, DOV006, DOV025, DOV022C, DOV026 and DOV008. The notable exceptions are DOV021, DOV032, DOV007 and DOV021, DOV010 and DOV029. Of the 14 weaker performing site options in and around Dover, five were selected for allocation: DOV017, DOV023, DOV012, GUS002 and WHI001 (in combination with previously allocated WHI008).

Deal residential site option SA findings

5.29 The site options in closest proximity to Deal's centre perform (DEA018 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 (DEA020 and 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 Wellbeing).

5.30 All seven of the site options within and around Deal have been allocated in the Draft Local Plan.

Aylesham and Sandwich residential site option SA findings

5.31 With the exception of the small site AYL001 accessibly located close to the centre of Aylesham and AYL005 and the

most remote, least accessible Sandwich site SAN010, the Sandwich site options generally perform better against the SA framework than the Aylesham site options. 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 designed within Source Protection Zones and some of the District's best and most versatile agricultural land, resulting in potential for adverse effects against SA objective 5 (Natural 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 and SAN023, are in close proximity to local services and facilities. Notable exceptions to this include SAN019 and SAN010, which perform relatively poorly against the SA framework, alongside Aylesham sites AYL002, AYL003 and AYL004.

5.32 Of the 15 site options within and around Aylesham and Sandwich, 11 have been allocated in the Draft Local Plan. Nine of the top 11 most strongly performing site options have been selected for allocation: AYL001, SAN008, SAN006, SAN013, SAN015, SAN007, SAN023, AYL002 and AYL004. The notable exclusions are AYL005 and SAN024. Of the four remaining weakest performing site options in and around Aylesham and Sandwich, two were selected for allocation: AYL003 and SAN019.

Local centre residential site option SA findings

5.33 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.

5.34 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 ecological (SA objective 9) and landscape assets (SA objective 11) in Ash and Wingham and historic assets in St Margret's at Cliffe.

5.35 Of the 37 site options within and around the District's local centres, 26 have been allocated in the Draft Local Plan across the settlements of Ash, Eastry, Elvington, Eythorne, Shepherdswell with Coldred, St Margret's at Cliffe and Wingham. 19 of the top 28 most strongly performing site options have been selected for allocation: EYT008, SHE008, EYT012, SHE004, EYT003, EYT019, ASH015, WIN003, ASH003, ASH011, STM003, STM006, EAS002, ASH014, SHE006, EYT009, EYT001, STM007 and STM008. The notable exclusions are EYT015, SHE001, EAS011, EYT004, EYT002, STM010, STM011, ASH005 and EAS007. Of the nine remaining weakest performing site options in and around the local centres, seven were selected for allocation: WIN014, EAS009, EAS012, WIN004, SHE003, ASH004 and ASH010.

Village residential site option SA findings

5.36 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, Chillenden, Finglesham, Ringwould and Staple generally have relatively poor performing site options. The site options which perform the strongest against the SA framework (NON004, LYD003, KIN002, HOU004, WOO002, WOO005, CAP009, CAP013, GTM003, LAN003, NON006, NON009, PRE003, PRE016, SUT002 and SUT009) are located in Nonington, Lydden, Kingsdown, West Hougham, Woodnesborough, Capel le Ferne, Great Mongeham, East Langdon and East Studdal. 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 Zones and good quality agricultural land (SA objective 5), flood risk (SA objective 7) or ecological assets (SA objective 9).

5.37 The weakest performing site options (NOR003, PRE007, GOO006, STA003, STA008, STA009, RIN003 and NOR005) 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), ecological assets (SA objective 9) and/or areas of flood risk (SA objective 7). Some of these sites are particularly isolated from local services and facilities (STA003, STA008 and RIN003). Others (GOO006, STA003, STA009 and NOR005) perform less well because the presence of notable areas of flood risk (SA objective 7) and/or local historic assets (SA objective 10). The Ringwould site options (RIN002, RIN003 and RIN004) are in particular 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 Wellbeing).

5.38 Of the 43 site options within and around the District's villages, 21 have been allocated in the Draft Local Plan across the settlements of Alkham, Capel le Ferne, Chillenden, East Langdon, Great Mongeham, Kingsdown, Lydden, Northbourne, Preston, Woodnesborough and Worth. 12 of the top 21 most strongly performing site options have been selected for allocation: LYD003, KIN002, WOO005, CAP009, CAP013, GTM003, LAN003, NON006, PRE003, PRE016, CAP006 and WOO006. The notable exceptions are NON004, HOU004, WOO002, NON009, SUT002, SUT009, GOO007, TIL001 and WOR007. Of the 24 remaining weakest performing site options in and around the villages, 10 have been selected for allocation: WOR009, ALK003, CAP011, PRE017, RIN004, STA004, WOR006, CAP006, GOO006 and NOR005.

Employment site option SA findings

5.39 24 reasonable employment site options have been identified by the Council and appraised through the SA. The employment site options are illustrated in **Figure 5.2**.

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

5.41 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 Sandwich. The remaining site options are relatively small and are scattered in a handful of the other settlements, including some smaller villages.

5.42 No single settlement's employment sites perform particularly better than any other. The best performing sites are located in particularly accessible locations, notably site 23 in Dover, 11 in Deal, 4 in Aylesham and 3 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 3, 11 and 23. 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 in Northbourne, 13 in Worth, 24 in Eastry and 1 north of Sandwich.

5.43 Despite some sites being located in relatively central locations with good access to the District's highway network, they are not in close proximity to more sustainable modes of transport and still have the potential to adversely affect the local environment, such as sites 8, 9 and 18 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.

5.44 Of the 24 site options within and around the District, 13 have been allocated in the Draft Local Plan in and around various settlements in the District's settlement hierarchy:

- **Dover / Whitfield** – Of the 10 site options within and around Dover and Whitfield, three Dover sites and two Whitfield site have been allocated in the Draft Local Plan. One of the five most strongly performing site options have been selected for allocation: 17 – A20 Sites. The notable exclusions are 23 – the Citadel, 21 – Mid Town, 12 – Land to the East of Sandwich Road and 22 – Carparks off Castle and Church Street. Of the five weaker performing site options in and around Dover and Whitfield, four were selected for allocation: 20 – Port Zone, 7 – White Cliffs Business Park, 18 – Dover Waterfront and 8 – Barwick Road Industrial Estate.
- **Deal** – Of the two site options within and around Deal, the least sustainable site has been allocated in the Draft Local Plan: 10 – Deal Business Park.
- **Aylesham/Sandwich** – Of the two Aylesham sites and three Sandwich sites all five have been allocated in the Draft Local Plan.
- **Local centres** – The best and least well performing sites, both located within and around the local centre of Eastry, were not selected for allocation. However, the middle performing site 5 – Pike Road Industrial Estate near Eythorne has been allocated.
- **Villages** – Of the four site options within and around the District's villages, the site option in the village Worth (13- Worth Centre) has been allocated in the Draft Local Plan. This site performs the least well alongside Site 6 – Betteshanger Colliery Pithead near Northbourne. Site 16 – Land at Ringwould Alpines near Ringwould performs the best, followed by Site 14 – Land off Holt Street, Snowdown (near Aylesham).

Gypsy and traveller site option SA findings

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

5.46 **Table 5.8** illustrates the effects of all the reasonable gypsy and traveller site options appraised.

5.47 Both site options have been allocated in the Draft Local Plan.

Reasons for the selection of the preferred growth and spatial strategy

5.48 Following the SA of the reasonable growth and spatial options set out in **Chapter 4**, and the SA of the reasonable site options, the Council selected its preferred scale of growth and spatial strategy. The decision was made in light of the SA findings, the availability and suitability of the site options, the Dover Local Plan's wider evidence base as well as the views of stakeholders and the public.

5.49 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.

5.50 **Appendix E** sets out the Council's reasons for the selection of specific sites for allocation in light of the reasonable alternatives identified.

Changes to preferred site boundaries following selection

5.51 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. **Table 5.8** illustrates the updated potential effects of the revised sites. The majority of the site boundary changes in effects. Notable exceptions include the boundary changes to:

- CAP006 avoid the potential for significant negative effects against SA7 (flood risk).
- DOV017 reduce the likelihood of significant negative effects on SA9 (biodiversity, but the revised boundary also marginally increases the distance of the site from

existing local services and facilities, marginally reducing the accessibility of the site and therefore the significance of the positive effects recorded against SA2 (health and wellbeing), SA 4 (transport) and SA 8 (climate change).

- SAN019 avoid the potential for significant negative effects against SA7 (flood risk).
- SHE004 increase the distance of the site from existing sustainable transport modes, reducing the potential for positive effects against SA4 (transport) and SA8 (climate change).

5.52 The effects identified in **Table 5.8** were considered alongside the effects of the unchanged sites illustrated in the tables above in the SA of the residential and employment site allocation policies in **Chapter 6**. The location and boundaries of the preferred residential and employment sites are illustrated in **Figure 5.3**.






-  District boundary
-  Neighbouring district boundary
-  Employment
-  Gypsy and Traveler
-  Residential



Table 5.8: Updated effects for selected residential and employment sites with revised boundaries

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									
Residential Sites with Revised Boundaries												
AYL003	+	+	0	+	+	--	0?	--	+	--	-?	-?
AYL004	+	0	0	+	+	--	0?	--	+	-	-?	-?
CAP006	+	-	0	+	-	--	0?	0	-	-	-?	0?
DOV017	+	+	--	+	+	-	0?	--	+	-	-?	0?
EYT003	+	-	0	+	+	--	0?	0	+	0	-?	0?
EYT009	+	0	0	+	+	--	0?	--	+	--	-?	0?
EYT012	+	-	0	+	0	-	0?	0	0	0	-?	0?
SAN015	+	+	0	+	+	--	0?	--	+	-	0?	-?
SAN019	+	-	-	+	0	--	0?	0	0	-	-?	0?
SHE004	+	-	0	+	+	-	0?	0	+	-	-?	-?
WHI001	+	-	--	+	-	--	0?	--	-	--	-?	0?
Employment Sites with Revised Boundaries												
1 – Ramsgate Road	0	-	0	+	-	-	0?	--	-	--	--?	0?
2 – Discovery Park	0	+	0	+	+	--	0?	--	+	--	--?	0?
3 – Sandwich Industrial Estate	0	+	0	+	+	-	0?	--	+	-	--?	0?
4 - Aylesham Development Area	0	+	0	+	++	--	0?	0	++	-	-?	-?
7 – White Cliffs Business Park	0	0	0	+	0	--	0?	--	0	-	0?	0?

Chapter 5

SA of site options

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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									
18 – Dover Waterfront	0	+	--	+	+	-	0?	--	+	--	--?	0?
Key	-- Significant negative effect likely			++ Significant positive effect likely		- Minor negative effect likely		+ Minor positive effect likely			0 Negligible effect likely	

Chapter 6

Draft Local Plan SA

6.1 This chapter sets out and appraises the preferred contents of the Draft Local Plan, as well as the reasonable alternative options considered in their development.

Outline of the structure and contents of the Draft Local Plan

6.2 The Draft Local Plan sets out Dover District's 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.

6.3 The policies plan to deliver the District's housing needs (a minimum of 11,920 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 wellbeing.

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

6.5 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

6.6 The appraisal in this chapter is 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.

6.7 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.

6.8 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. New reasonable alternatives identified through the consultation of the Draft Local Plan will be tested in the next iteration of the SA.

6.9 Following the appraisal of the Draft Local Plan and its reasonable alternatives consideration is given to the measures likely to be employed to avoid and mitigate the significant adverse effects identified through the SA of the Draft Local Plan, specifically through the implementation of other plans, programmes and policies within the Draft Local Plan and other relevant documents.

6.10 Consideration is also given to the likely duration of the Draft Local Plan's effects, their secondary, cumulative and synergistic effects, as well as their in-combination effects with other relevant plans, programmes and policies.

Vision and strategic objectives

6.11 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 wellbeing.'

6.12 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 21st 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.

6.13 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 Chapters
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.	
	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.	

Vision Themes	Strategic Objectives	Relevant Draft Local Plan Policy Chapters
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 wellbeing 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.	
	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

6.14 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 30th July 2020. The draft 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

6.15 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

6.16 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.

6.17 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, wellbeing, recreation and integration

6.18 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.

6.19 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

6.20 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.

6.21 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.22 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.

6.23 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.

6.24 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

6.25 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.

6.26 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 this 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.

6.27 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

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

6.29 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.

6.30 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

6.31 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.

6.32 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.

6.33 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

6.34 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.

6.35 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.

6.36 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

6.37 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.

6.38 The strategic objective that promotes the protection and enhancement of the District's ecological assets is likely to generate a **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, including wider natural landscapes are considered to generate indirect minor positive effects against this objective.

6.39 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

6.40 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.

6.41 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.

6.42 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.

6.43 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

6.44 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.

6.45 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.

6.46 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.

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

Vision and strategic objectives recommendations

6.48 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

6.49 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

6.50 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.

6.51 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

6.52 Dover District Council declared a climate change emergency on the 4th 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.

6.53 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

6.54 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.

6.55 All of the above options are considered reasonable at this stage and have therefore been appraised against the SA framework.

6.56 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 mitigation)**; 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 mitigation).

6.57 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)**.

6.58 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 and townscape), 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.

6.59 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

6.60 In light of the reasonable alternatives considered and appraised, the Council has 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.

6.61 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

6.62 With regards to promoting sustainable design and construction 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 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.

6.63 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.

6.64 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.

6.65 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.

6.66 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

6.67 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 has been selected.

Renewable and low carbon energy

6.68 With regards to the promotion of renewable and low carbon energy technologies in the Local Plan, the Council considers 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 on-shore wind energy generation.
- c. Rely on the NPPF and PPG when providing planning advice and determining planning applications for development in the District.

6.69 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.

6.70 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 mitigation)**. 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.

6.71 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 mitigation). Similarly, the strength of the policy 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 such technologies the more this will affect the viability and therefore the delivery of new, affordable homes and business premises in the District.

6.72 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.

6.73 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 and townscape)**, 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.

6.74 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.

6.75 Consequently, both options have the potential to generate **significant positive** effects against **SA objective 8** and minimise associated adverse effects against SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape) 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

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

6.77 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 is preferred. Therefore, option a has been selected.

Sustainable travel

6.78 With regards to promoting sustainable travel 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 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.

6.79 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.

6.80 Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against **SA objectives 2 (health and wellbeing), 4 (travel), 6 (air pollution) and 8 (climate change mitigation)**, and minor positive effects in relation to SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape). 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.

6.81 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 (travel) and 8 (climate change mitigation), 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 2 (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.

6.82 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

6.83 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) is considered to provide an insufficient level of guidance for applicants and officers. Therefore, option a has been selected.

Water efficiency

6.84 With regards to the promotion of water efficiency in the Local Plan, the Council considers 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.

6.85 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.

6.86 Adopting the more stringent water efficiency standard in a local policy has the potential to generate **significant positive** effects against **SA objectives 5 (natural resources) and 7 (climate change adaptation)**, 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

6.87 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) is preferred.

Flood risk

6.88 With regards to managing flood risk 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 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.

6.89 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.

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

6.91 A general, high-level local policy approach is more likely to generate minor positive effects against SA objective 7 (climate change adaptation).

Council's reasons for selecting the preferred option

6.92 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 is 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 has been selected.

Surface water management

6.93 With regards to surface water 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 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.

6.94 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.

6.95 Adopting a local approach to the management of this issue has the potential to generate **significant positive** effects against **SA objective 7 (climate change adaptation)**, and minor positive effects in relation to SA objectives 2 (health and well-being), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape). The significance of these effects are 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 (climate change adaptation).

Council's reasons for selecting the preferred option

6.96 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 is 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 has been selected.

Coastal change management areas

6.97 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.

6.98 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.

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

6.100 A general, high-level local policy approach is more likely to generate minor positive effects against SA objective 7 (climate change adaptation).

Council's reasons for selecting the preferred option

6.101 Drawing on the Strategic Flood Risk Assessment (2019) which highlights a number of areas in the District affected by coastal change, option a is 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 has been selected.

Carbon Sequestration

6.102 With regards to the promotion of carbon sequestration 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 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.

6.103 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.

6.104 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 (natural resources), 6 (air pollution), 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape)**, 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.

6.105 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 2 (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.

6.106 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

6.107 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 has 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

6.108 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

6.109 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, wellbeing, recreation and integration

6.110 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.

6.111 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.

6.112 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

6.113 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.114 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

6.115 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.

6.116 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.

6.117 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

6.118 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.

6.119 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

6.120 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.

6.121 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

6.122 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.

6.123 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

6.124 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.

6.125 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

6.126 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.

6.127 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

6.128 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.

6.129 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.

6.130 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 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	Policy 9: Tree Planting and Protection
SA1: Housing	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA2: Health and wellbeing	++	+	+	+	++	+	++	++	++	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
SA4: Travel	++	0	0	-	++	0	0	0	0	0
SA5: Natural resources	++	0	++	+/-	0	++	+	+	++	++
SA6: Air pollution	+	+	+	+	+	0	0	0	0	+
SA7: Climate change adaptation	++	0	++	0	0	++	++	++	++	++
SA8: Climate change mitigation	++	++	++	++	++	++	0	0	0	++
SA9: Biodiversity	++	0	+	+/-	+	+	+	+	+	++
SA10: Historic environment	+/-	+/-	+/-	0	+	0	+	+	+	0
SA11: Landscape and townscape	+/-	+/-	+/-	-	+	+	+	+	+	++
Key	++ Significant positive effect likely		+ Minor positive effect likely		- Minor negative effect likely		+/- Mixed minor effects likely		0 Negligible effect likely	

Climate change policy recommendations

6.131 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.

6.132 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).

6.133 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 (natural resources), 9 (biodiversity), 10 (historic environment) or 11 (landscape and townscape).

6.134 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.

6.135 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).

6.136 The Council considers 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. **Table 6.11** names the other policies that are likely to help in this regard.

New homes policies

6.137 The Council have drawn on initial consultation, the Local Plan evidence base, relevant legislation and the SA to define 15 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

6.138 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.

6.139 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

6.140 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 1²⁴**: Lowest growth scenario – meeting the minimum objectively assessed needs of the District: 8,700 new homes²⁵.
- b. **Growth Option 3²⁶**: 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.

6.141 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 required²⁷).
- 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.

6.142 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

6.143 Following the SA of the options, the Council has 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

6.144 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 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.

6.145 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.

6.146 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 (natural resources), 9 (biodiversity) and 11 (landscape and townscape). This is because there is greater

²⁴ Growth Option 2 contains the same scale of potential housing development to Growth Option 1, but a different scale of potential employment land development.

²⁵ Note: the figures referred to in the Draft Local Plan include a 10% buffer and exclude committed development and windfall allowances.

²⁶ Growth Option 3 includes a different scale of potential employment land development than Growth Option 1.

²⁷ Suitable sites prioritised over potentially suitable sites for growth option 1.

scope for loss of greenfield land at settlement edges that 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

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

Housing allocations

6.148 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

6.149 Justification for the selection of site allocations is included in **Appendix E**. 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. 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. Further explanation of this process is provided in the Housing Topic Paper.

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

6.150 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 need and cultural need identified in the GTAA.
- d. Identify site allocations to deliver fewer pitches than the traveller site need and cultural need identified in the GTAA.

- e. Rely on windfall planning consents to address travellers' needs established in the GTAA.

6.151 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.

6.152 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.

6.153 Option a aim 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).

6.154 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).

6.155 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)**.

6.156 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

6.157 The Council has 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.

6.158 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 is included in **Appendix E**.

Type and mix of housing

6.159 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.

6.160 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.

6.161 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.

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

Council's reasons for selecting the preferred option

6.163 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 has 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

6.164 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.

6.165 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.

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

Council's reasons for selecting the preferred option

6.167 No other alternatives have been identified and the above options have been taken forward and appraised in the new homes policies SA section below.

Self and custom build housing

6.168 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.

6.169 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.

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

6.171 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.

6.172 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).

6.173 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

6.174 Due to the relatively low number of plots on the register the Council's preferred option is 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

6.175 With regards to residential extensions and annexes, the Council considers 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.

6.176 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

6.177 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 is to include a policy to assist in the delivery of residential extensions and annexes.

Houses in multiple occupation

6.178 With regards to houses in multiple occupation (HMO), the Council consider 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.

6.179 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.

6.180 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

6.181 Having considered the evidence, SA findings and opportunities and policy context within Dover, the preferred approach is 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.

6.182 In some cases the creation of HMO's does not require planning permission, if it is a change for an existing C3 dwelling housing 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

6.183 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

6.184 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.

6.185 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.

6.186 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.

6.187 This is acknowledgement of 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, wellbeing, recreation and integration

6.188 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.

6.189 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.

6.190 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.

6.191 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.

6.192 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.

6.193 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.

6.194 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.

6.195 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.

6.196 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.

6.197 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.

6.198 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.

6.199 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.

6.200 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.

6.201 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.

6.202 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

6.203 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.

6.204 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.

6.205 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.

6.206 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.207 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.

6.208 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.

6.209 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.

6.210 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.

6.211 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 or set-up home businesses, reducing the need for commuting and its associated impact on road congestion at peak times.

6.212 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.

6.213 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

6.214 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.

6.215 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

6.216 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.

6.217 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.

6.218 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 NO₂ and/or PM₁₀ in sensitively areas include the previously allocated site WHI008 covered under Strategic Policy 4 (Whitfield Urban Expansion) and sites DOV017, DOV018, DOV023, EYT001, GUS002, LYD003 and WIB014 allocated in Site Allocations 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

6.219 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

6.220 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.

6.221 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.

6.222 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.

6.223 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.

6.224 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.

6.225 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 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.

6.226 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

6.227 Precautionary uncertain **significant adverse** 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.

6.228 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.

6.229 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.

6.230 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.

6.231 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.

6.232 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

6.233 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.

6.234 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.

6.235 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.

6.236 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.

6.237 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.

6.238 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

6.239 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.

6.240 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.

6.241 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.

6.242 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.

6.243 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.

6.244 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.

6.245 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 Elvington 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 wellbeing	++/-	-	++/-	++	++	++/-	+/-	++	--	++	++/-	++	+	+/-	+	+
SA3: Employment	++/-	0	+	+	+	+	+/-	0	+/-	0	0	0	0	0	+	0
SA4: Travel	++/-	+	+/-	+	++	++	+/-	0	-	0	0	-	+/-	0	+	-
SA5: Natural 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: Climate change adaptation	-	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0
SA8: Climate change mitigation	++/-	0	+	+	+	+	+/-	0	-	0	0	0	0	0	0	0
SA9: Biodiversity	--?	--?	--/+?	--/+?	--/+?	--/+?	--?	0	-	0	0	-	-	-	0	-
SA10: Historic environment	-	-	+/-	+/-	+/-	+/-	-	0	-	0	0	-	-	-	0	-
SA11: Landscape and townscape	-	-	+/-	+/-	+/-	+/-	-	0	-	0	0	-	-	-	0	-
Key	-- Significant negative effect likely		++ Significant positive effect likely		++/- Mixed significant positive and minor		+/- or ++/-- Mixed minor or significant effects likely		- Minor negative effect likely		+ Minor positive effect likely		0 Negligible effect likely			

New homes policy recommendations

6.246 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.

6.247 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 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.

6.248 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. 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 has selected the allocated sites over the reasonable alternatives performing equally well or better is set out in **Appendix E**.

6.249 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 site's 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.

6.250 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 considers 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.

6.251 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.

6.252 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.

6.253 The minor adverse effect recorded against SA objective 7 (climate change adaptation) 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 consider other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects. **Table 6.11** names the other policies that are likely to help in this regard.

6.254 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.

6.255 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.

6.256 The minor adverse effect recorded against SA objective 11 (landscape and townscape) 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.

6.257 The minor adverse effects recorded against SA objectives 9 (biodiversity), 10 (historic Environment) and 11 (landscape and townscape) 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. **Table 6.11** names the other policies that are likely to help in this regard.

Employment and local economy policies

6.258 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.
- Policy 19: Retention of Existing Employment Sites.
- Policy 20: Loss or Re-development of Employment Sites and Premises.
- Policy 21: Home Working.
- Policy 22: Conversion or Rebuild of Rural Buildings for Economic Development Purposes.
- Policy 23: New Employment Premises in the Countryside.
- Policy 24: Tourism and Tourist/Visitor Accommodation.

Reasonable alternatives SA

6.259 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.

6.260 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

6.261 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 1²⁸**: Lowest growth scenario – meeting the minimum objectively assessed needs of the District: potentially no net increase in employment land over the Plan period²⁹.
- b. **Growth Options 2 and 3³⁰**: 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 138,238m².

6.262 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.

6.263 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

6.264 Following the SA of the options, the Council has 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 consider 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 is to base the level of economic growth on the draft Economic Strategy. It is 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.

6.265 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.

6.266 This preferred scale and distribution of growth is appraised below in the SA of the draft Employment and Local Economy policies.

Employment allocations

6.267 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**. 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.

6.268 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

6.269 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.

6.270 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 Strategy. The Council is therefore carrying out a call for employment sites as part of the Regulation 18 consultation on the Local Plan. New reasonable site options identified

²⁸ Growth Option 2 contains the same scale of potential housing development to Growth Option 1, but a different scale of potential employment land development.

²⁹ The Economic Development Needs Assessment (2017) forecasts a negative

requirement in new floorspace for employment development over the Plan period.

³⁰ Both growth options 2 and 3 include the same potentials scale of employment land development: up to 138,238m².

through this exercise will be considered and subjected to SA as part of the drafting of the next iteration of the Local Plan.

New employment development and the retention of existing employment sites

6.271 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.

6.272 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.

6.273 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.

6.274 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 (natural resources), 7 (climate change adaptation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape). 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

6.275 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.

6.276 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**.

Home working

6.277 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.

6.278 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.

6.279 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 (travel), 6 (air pollution) and 8 (climate change mitigation) 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.

6.280 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

6.281 In light of the increasing requirement for homeworking space, the Council consider a local policy requiring suitable facilities be incorporated into new build (option a) and criteria for home working within existing residential properties (option c) is appropriate.

New employment premises in the countryside and conversion or rebuild of rural buildings for economic development purposes

6.282 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.

6.283 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 a 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 (natural 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 and townscape).

6.284 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 (travel) and 6 (air pollution). The potential significance of these adverse effects is dependent on the location and scale of the rural economic development.

6.285 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 (travel), 5 (natural

resources), 6 (air pollution), 7 (climate change adaptation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape).

Council's reasons for selecting the preferred option

6.286 The Council's preferred policy approach is 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

6.287 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.

6.288 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.

6.289 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.

6.290 Both options have the potential to result in the loss of greenfield land with the potential for adverse effects against SA objectives 5 (natural resources), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape).

6.291 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 (travel) 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

6.292 The preferred policy approach is 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

6.293 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

6.294 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, wellbeing, recreation and integration

6.295 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.

6.296 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.

6.297 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).³¹ 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.

6.298 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.

6.299 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

6.300 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.

6.301 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

³¹ 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.

premises, along with the development of new tourism attractions and holiday accommodation.

6.302 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

6.303 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 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.

6.304 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.

6.305 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.

6.306 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.

6.307 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.

6.308 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

6.309 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).

6.310 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.

6.311 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

6.312 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.

6.313 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 adverse effect air quality.

6.314 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.

6.315 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

6.316 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

6.317 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.

6.318 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.

6.319 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.

6.320 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

6.321 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.

6.322 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.

6.323 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 to 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.

6.324 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

6.325 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.

6.326 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.

6.327 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 to 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.

6.328 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

6.329 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.

6.330 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.

6.331 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 to 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.

6.332 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 wellbeing	++/-	+/-	-	+/-	+	+	-	-	+
SA3: Employment	++	++	++	++	+/-	+	+	++	++
SA4: Travel	-	+/-	-	+/-	0	+	-	-	+
SA5: Natural resources	++/--	++/--	-	++/--	0	0	+	-	-
SA6: Air pollution	-	0?	-	0?	0	+	-	-	0
SA7: Climate change adaptation	-	-	0	-	0	0	0	0	0
SA8: Climate change mitigation	-	+/-	-	+/-	0	+	-	-	0
SA9: Biodiversity	-	--?	-	-	0	0	-	-	-
SA10: Historic environment	-	-	-	-	0	0	-	-	-
SA11: Landscape and townscape	-	-	-	-	0	0	-	-	-
Key	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effects likely		+/- or ++/-- Mixed minor or significant effects likely		- Minor negative effect likely		+	0 Negligible effect likely

Employment and local economy policy recommendations

6.333 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 may be scope to minimise the significance or likelihood of some of the potential adverse effects identified.

6.334 The significant adverse effects identified for SA objective 5 (natural 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.

6.335 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. 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 has selected the allocated sites over the reasonable alternatives performing equally well or better is set out in **Appendix E**.

6.336 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. **Table 6.11** names the other policies that are likely to help in this regard.

6.337 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.

6.338 The minor adverse effects recorded against SA objective 7 (climate change adaptation) 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.

6.339 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.

6.340 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.

6.341 The minor adverse effect recorded against SA objective 11 (landscape and townscape) 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.

6.342 The minor adverse effects recorded against SA objectives 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape) 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.

6.343 With regards to the recommendations outlined above for SA objectives 7 (climate change adaption), 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 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. **Table 6.11** names the other policies that are likely to help in this regard.

Retail and town centre policies

6.344 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

6.345 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.

6.346 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

6.347 With regards to managing the quantity and location of retail development in the Local Plan, the Council considers 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.

6.348 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.

6.349 Both options are also likely to generate minor positive effects in relation to SA objectives 4 (travel), 6 (air pollution) and 8 (climate change mitigation) 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

6.350 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 is 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 has been selected.

Dover town centre

6.351 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.

6.352 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.

6.353 All options are also likely to generate minor positive effects in relation to SA objectives 4 (travel), 5 (natural resources), 6 (air pollution) and 8 (climate change mitigation) 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.

6.354 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

6.355 In light of the reasonable alternatives considered and appraised, the Council has 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 full Plan period whilst meeting the requirements of the NPPF.

Deal and Sandwich town centres

6.356 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.

6.357 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.

6.358 All options are also likely to generate minor positive effects in relation to SA objectives 4 (travel), 5 (natural resources), 6 (air pollution) and 8 (climate change mitigation) 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

6.359 In light of the reasonable alternatives considered and appraised, the Council has 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.

6.360 Similarly, designating a primary shopping area in Sandwich is considered to be more positive and proactive in guiding decisions in the settlement's centre.

Retail and town centres including primary shopping areas

6.361 With regards to the definition of acceptable uses in centres for shopping in the Local Plan, the Council considers 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.

6.362 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).

6.363 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

6.364 In light of the reasonable alternatives considered and appraised, the Council has selected option b. This more flexible approach is 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 is 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 is therefore considered to be justified.

Sequential test and impact assessment

6.365 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 considers 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.

6.366 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.

6.367 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 (travel), 6 (air pollution) and 8 (climate change mitigation). 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

6.368 The Council has 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

6.369 With regards to the protection of local centres in the District, the Council considers 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.

6.370 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.

6.371 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 (travel), 6 (air pollution) and 8 (climate change mitigation). 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

6.372 The Council has 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 supports new convenience stores through a criteria based policy.

Shop fronts

6.373 With regards to the definition of a policy to protect the historic character and local distinctiveness of primary shopping areas, the Council considers 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.

6.374 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.

6.375 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 and townscape). 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

6.376 The Council has 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

6.377 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

6.378 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.

6.379 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, wellbeing, recreation and integration

6.380 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.

6.381 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.

6.382 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.

6.383 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

6.384 A minor positive effect is expected against all objectives. 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.385 A minor positive effect is expected against all objectives 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

6.386 A minor positive effect is expected against all objectives 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

6.387 A minor positive effect is expected against all objectives 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

6.388 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

6.389 A minor positive effect is expected against all objectives 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

6.390 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, this 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

6.391 A minor positive effect is expected against all objectives 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

6.392 A minor positive effect is expected against all objectives 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.

6.393 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 wellbeing	++	++	++	+	+	+/-	+
SA3: Employment	+	+	+	+	+	+	+
SA4: Travel	+	+	+	+	+	+	0
SA5: Natural resources	+	+	+	+	+	0	0
SA6: Air pollution	+	+	+	+	+	+	0
SA7: Climate change adaptation	0	+	+	0	0	0	0
SA8: Climate change mitigation	+	+	+	+	+	+	0
SA9: Biodiversity	0	+	+	0	0	0	0
SA10: Historic environment	+	+	+	+	0	0	+
SA11: Landscape and townscape	+	+	+	+	0	0	+
Key	++ Significant positive effect likely		+/- Mixed minor effects likely		+ Minor positive effect likely		0 Negligible effect likely

Retail and town centre policy recommendations

6.394 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.

6.395 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.

6.396 Strategic Policy 11 (Dover Town Centre) highlights the importance of green infrastructure within the town centre. The original wording of the included in Strategic Policy 12 (Deal, Sandwich Town Centres) did not include this reference, limiting the opportunity for positive effects against SA objectives 7 (climate change adaptation) 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

6.397 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

6.398 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.

6.399 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.

Infrastructure and developer contributions

6.400 With regards to the protection and investment in new and improved infrastructure in the District, the Council consider 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.

6.401 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 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape) are also likely, but are generally rarer resulting in more minor positive effects.

6.402 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.

6.403 General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

6.404 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.

6.405 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

6.406 The Council has elected to continue with option a, adding references to site specific needs and 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

6.407 With regards to managing strategic highways infrastructure, the Council consider 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.

6.408 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.

6.409 Both options a and b have the potential to generate **significant positive** effects against **SA objective 4 (travel)** 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 mitigation) 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.

6.410 General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

6.411 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.

6.412 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.

6.413 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

6.414 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.

The highway network and highway safety

6.415 With regards to managing the highway network, including highway safety, the Council consider 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.

6.416 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 (travel)** 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 mitigation) through the more effective management of congestion and air pollution issues in the District.

6.417 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. General, high-level local policy approaches are more likely to generate minor positive effects against the same SA objectives in the SA framework.

6.418 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

6.419 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 has elected to adopt a similar approach to the existing Core Strategy in the Local Plan.

Parking provision on new development

6.420 With regards to managing parking provision on new developments, the Council consider 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.

6.421 All three options have the potential to generate **significant positive** effects against **SA objective 4 (travel)** 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 mitigation) through the consequently reducing and increasing traffic flows and air pollution in the District.

6.422 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

6.423 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

6.424 With regards to the provision of open space, the Council consider 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.

6.425 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.

6.426 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 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape) 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.

6.427 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

6.428 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.

6.429 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

6.430 With regards to the provision of playing pitches, the Council consider 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.

6.431 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.

6.432 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

6.433 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).

6.434 The Council has 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

6.435 With regards to the protection of open space, the Council consider 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.

6.436 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.

6.437 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 (climate change adaptation), 8 (climate change mitigation), 9

(biodiversity), 10 (historic environment) and 11 (landscape and townscape) 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.

6.438 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.

6.439 A minor negative effect is also recorded against this SA objective 2 (health and well-being) for option a because it make provision for scenarios in which loss of open space may be permitted, albeit in relatively rare occasions.

6.440 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

6.441 The Council has 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

6.442 With regards to the management of community facilities, the Council consider 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.

6.443 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.

6.444 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

6.445 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.

6.446 The Council is committed to pursue the more comprehensive option: option a, protecting all community facilities.

Digital technology

6.447 With regards to facilitating the provision of digital technology, the Council consider 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.

6.448 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.

6.449 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 (travel), 5 (air pollution) and 8 (climate change mitigation) 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

6.450 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

6.451 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

6.452 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.

6.453 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, wellbeing, recreation and integration

6.454 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.

6.455 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.

6.456 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.

6.457 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.

6.458 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

6.459 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).

6.460 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.

6.461 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.

6.462 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.

6.463 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.464 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.

6.465 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

6.466 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

6.467 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.

6.468 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.

6.469 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

6.470 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

6.471 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.

6.472 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.

6.473 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

6.474 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.

6.475 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 or habitats in certain locations.

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

6.476 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.

6.477 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

6.478 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.

6.479 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 wellbeing	++	+/-	+/-	+/-	++	++	+/-	++	+
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+
SA4: Travel	++	++/-	+/-	+/-	0	0	0	0	0
SA5: Natural resources	+	0	0	0	0	0	0	0	0
SA6: Air pollution	+	+/-	+/-	+/-	+	0	+/-	0	0
SA7: Climate change adaptation	+	0	0	0	+	0	0	0	0
SA8: Climate change mitigation	+	+/-	+/-	+/-	+	0	+/-	0	0
SA9: Biodiversity	+	0	0	0	+	0	+/-	0	0
SA10: Historic environment	0	0	0	0	+	0	+/-	0	0
SA11: Landscape and townscape	+	0	0	0	+	0	+/-	0	0
Key	++ Significant positive effect likely		+/- Mixed minor effects likely		+ Minor positive effect likely		0 Negligible effect likely		

Transport and infrastructure policy recommendations

6.480 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)**.

6.481 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 mitigation). It was concluded that other policies in other chapters of the Draft Local Plan help to avoid and mitigate these potential negative effects. **Table 6.11** names the other policies that are likely to help in this regard.

6.482 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 mitigation), 9 (natural environment), 10 (historic environment) and 11 (landscape and townscape), 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

6.483 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

6.484 Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

6.485 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.

6.486 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.

6.487 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.

6.488 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

6.489 The Council has 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 is 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

6.490 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

6.491 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.

6.492 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, wellbeing, recreation and integration

6.493 All the design policies have the potential to generate **significant positive** effects against this SA objective.

6.494 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

6.495 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.

6.496 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

6.497 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

6.498 Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

6.499 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

6.500 Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

6.501 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

6.502 Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective 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

6.503 Strategic Policy 15 (Place Making) and DM Policy 36 (Achieving High Quality Design) are expected to have a minor positive effect against this objective.

6.504 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

6.505 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 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

6.506 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

6.507 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 townscape, 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 townscape.

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 wellbeing			++	++	++
SA3: Employment			++/-	+/-	+/-
SA4: Travel			+	+	0
SA5: Natural resources			+	+	0
SA6: Air pollution			+	+	0
SA7: Climate change adaptation			+	+	0
SA8: Climate change mitigation			+	+	0
SA9: Biodiversity			+	+	0
SA10: Historic environment			+	+	0
SA11: Landscape and townscape			++	++	0
Key	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effects likely	+/- Mixed minor or significant effects likely++	+ Minor positive effect likely	0 Negligible effect likely

Design policy recommendations

6.508 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 and townscape)**. 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.

6.509 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 (climate change adaptation) and 8 (climate change mitigation). It was however concluded that this was appropriately encouraged by other policies in other chapters, specifically the climate change chapter.

Natural environment policies

6.510 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

6.511 Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

6.512 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.

6.513 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 (natural resources, 6 (air pollution), 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape)**, 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.

6.514 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

6.515 The Council has 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 is 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 conservation 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.

6.516 Other more specific policy options covered under the relevant natural environment policy headers are set out below.

Biodiversity net gain

6.517 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.

6.518 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 (natural resources), 6 (air pollution), 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape and townscape)**. 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

6.519 As the Council has yet to see evidence for a 20% requirement, the preferred policy option for Biodiversity Net Gain is set at 10%.

Landscape character

6.520 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.

6.521 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 and townscape)**.

Council's reasons for selecting the preferred option

6.522 The Council has 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

6.523 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.

6.524 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 (natural resources)** and **7 (climate change adaptation)**, and more indirect minor positive effects on the health and well-being (SA objective 2), biodiversity (SA objective 9) and landscape.

Council's reasons for selecting the preferred option

6.525 The Council has 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

6.526 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

6.527 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, wellbeing, recreation and integration

6.528 All the natural environment policies have the potential to generate minor positive effects against this SA objective.

6.529 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

6.530 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.531 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

6.532 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.

6.533 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

6.534 DM Policy 41 (Air Quality) is expected to have a **significant positive** effect against this objective.

6.535 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

6.536 DM Policy 42 (Water Quality and Supply) is expected to have a **significant positive** effect against this objective, as it aims 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.

6.537 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

6.538 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.

6.539 This is because these policies directly promote climate change mitigation either through encouraging low emission lifestyles and 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

6.540 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.

6.541 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.

6.542 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.

6.543 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

6.544 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

6.545 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.

6.546 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.

6.547 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 /	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 wellbeing	+	+	+	+	+	+	+	+	
SA3: Employment	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	
SA4: Travel	0	0	0	0	0	+	0	0	
SA5: Natural resources	+	+	+	+	+	0	++	+	
SA6: Air pollution	0	0	0	0	0	++	0	0	
SA7: Climate change adaptation	+	+	+	+	0	0	++	+	
SA8: Climate change mitigation	+	+	+	+	0	+	0	0	
SA9: Biodiversity	++/-	++	++	+	++	+	+	+	
SA10: Historic environment	+	0	0	+	0	0	0	0	
SA11: Landscape and townscape	+	+	+	++	+	0	+	+	
Key	++ Significant positive effect likely		++/- Mixed significant positive and minor negative effect likely		+ Minor positive effect likely		+/- Mixed minor effects likely		0 Negligible effect like

Natural environment policy recommendations

6.548 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 (natural resources), 8 (air pollution), 7 (climate change adaptation), 9 (biodiversity) and 11 (landscape and townscape)**.

6.549 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

6.550 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

6.551 Before the definition of the preferred draft policies, consideration has been given to the policy options the Council could pursue.

6.552 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.

6.553 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 and townscape)**. These effects are however uncertain as it depends on the strength of policy wording on historic environment issues.

6.554 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.

6.555 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

6.556 The Council has 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 is 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

6.557 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

6.558 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, wellbeing, recreation and integration

6.559 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

6.560 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.

6.561 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.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.562 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

6.563 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

6.564 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

6.565 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

6.566 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

6.567 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.

6.568 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

6.569 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

6.570 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 wellbeing	+	+	+	+	+	+
SA3: Employment	+/-	+/-	+/-	-	+/-	+/-
SA4: Travel	0	0	+	0	+	0
SA5: Natural resources	0	0	0	0	0	0
SA6: Air pollution	0	0	+	0	+	0
SA7: Climate change adaptation	0	0	0	0	0	0
SA8: Climate change mitigation	0	+	0	0	0	0
SA9: Biodiversity	+	+	+	0	+	+
SA10: Historic environment	++	++/-	++	++	++	++
SA11: Landscape and townscape	++	++	++	++	++	++
Key	++ Significant positive effect likely	++/- Mixed significant positive and minor negative effect likely	+/- Mixed minor or significant effects likely	+	-	0 Negligible effect likely

Historic environment policy recommendations

6.571 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 and townscape)**.

6.572 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 a appropriate balance has been struck between the two.

Mitigation

6.573 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".

6.574 **Table 6.11** 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.

Table 6.11: Potential negative effects of Draft Local Plan policies and potential mitigation measures of other Draft Local Plan policies

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
SA1: Housing	<p>The policy requirements set out in all the climate change policies, design policies, natural environment policies, and all but one of each of the transport and infrastructure and historic environment 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 DM Policy 12 (Affordable Housing) and DM Policy 15 (Self and Custom Build Housing) have the potential to generate significant negative 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 Draft 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 Draft 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 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 cannot be reasonably mitigated.</p>
SA2: Health and wellbeing	<p>New homes Site Allocations Policy 2 (Land off Alkham Valley Road) has the potential to generate a significant negative effect against this SA objective. This is because the site does not enjoy easy access to a good range of local services and facilities.</p> <p>New homes policies Strategic Policy 2 (Housing Growth), Strategic Policy 3 (Residential Windfall Development), Strategic Policy 4 (Whitfield Urban Expansion), Strategic Policy 7 (Eythorne and Elvington Local Centre), Site Allocations Policy 1 (Housing Allocations), DM Policy 12 (Affordable 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) 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</p>	<p>The following policies should help to ensure impacts of the new homes and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 1: Reducing Carbon Emissions. ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 4: Sustainable Travel.

³² The negative effects identified in the SA of the Draft Local Plan Vision and Strategic Objectives are not repeated in this section. This is because the policies in the Draft 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 Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>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. 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. 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.</p> <p>Employment and local economy policies Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations), DM Policy 18 (New Employment Development), DM Policy 19 (Retentions of Existing Employment Sites), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) 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 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 Draft Local Plan's economic strategy generally focussing on areas of existing activity where effects are already occurring. Furthermore, 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 rural employment developments not to have a significant impact on the amenities of local residents, offering some scope for minor adverse effects.</p> <p>Retail and town centre policy DM Policy 27 (Local Centres) 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 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.</p> <p>Transport and infrastructure policies Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) 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 noise, light and air pollution in the District. DM Policy 33 (Protection of Open Spaces) also has the potential to generate a minor negative effect on this SA objective because it sets out the circumstances in which open space maybe lost, offering scope for open space loss in certain parts of the District.</p>	<ul style="list-style-type: none"> ■ Strategic Policy 10: Quality 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 28: Shop Fronts. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ Strategic Policy 14: Strategic Highway Infrastructure. ■ DM Policy 29: The Highway Network and Highway Safety. ■ 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. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ Strategic Policy 17: Green Infrastructure and Biodiversity. ■ DM Policy 41: Air Quality. ■ DM Policy 42: Water Quality and Supply. <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> <p>The following policies should help to ensure impacts of DM Policy 27 (Local Centres) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ Strategic Policy 10: Quality and Location of Retail Development. ■ DM Policy 25: Primary Shopping Areas. ■ DM Policy 26: Sequential Test and Impact Assessment ■ DM Policy 28: Shop Fronts.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
		<ul style="list-style-type: none"> ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 34: Community Facilities. ■ DM Policy 35: Digital Technology. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ DM Policy 37: Quality of Residential Accommodation. <p>The following policies should help to ensure impacts of DM Policy 33 (Protection of Open Spaces) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 32: Playing Pitch Strategy. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 34: Community Facilities. ■ Strategic Policy 15: Place Making. ■ Strategic Policy 17: Green Infrastructure and Biodiversity. <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"> ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 4: Sustainable Travel. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ Strategic Policy 17: Green Infrastructure and Biodiversity. ■ DM Policy 41: Air Quality. ■ DM Policy 42: Water Quality and Supply.
SA3: Employment	The policy requirements set out in all the climate change policies, design policies, natural environment policies, and all but one of each of the transport and infrastructure and historic environment policies could generate minor negative effects against this SA	No single policy in the Draft 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

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>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 Strategic Policy 2 (Housing Growth), Site Allocations Policy 1 (Housing Allocations) and Site Allocations Policy 2 (Land off Alkham Valley Road) 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 employment opportunities. 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>Employment and local economy policy DM Policy 20 (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 opportunity in limited scenarios in the District.</p>	<p>aspirations of the District; however the Draft Local Plan will be supported by an appropriate delivery strategy.</p> <p>The following policies should help to ensure impacts of the new home policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 1: Reducing Carbon Emissions. ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 4: Sustainable Travel. ■ Strategic Policy 8: Economic Growth. ■ 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 27: Local Centres. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ Strategic Policy 14: Strategic Highway Infrastructure. ■ DM Policy 34: Community Facilities. ■ DM Policy 35: Digital Technology. <p>All the other employment and local economy policies in the Draft Local Plan should help to ensure impacts of DM Policy 20 (Loss or Redevelopment of Employment Sites and Premises) on this SA objective are effectively managed through the Plan period.</p>
SA4: Travel	<p>Climate change DM Policy 3 (Renewable and Low Carbon Energy) 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 policies Strategic Policy 2 (Housing Growth), Strategic Policy 4 (Whitfield Urban Expansion), Site Allocations Policy 1 (Housing Allocations), Site Allocations Policy 2 (Land off Alkham Valley Road), DM Policy 13 (Rural Local Needs Housing), DM Policy 14 (Gypsy and Traveller Windfall Accommodation) and DM Policy 17 (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</p>	<p>The following policies should help to ensure impacts of climate change DM Policy 3 (Renewable and Low Carbon Energy) and the relevant new home, 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"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 4: Sustainable Travel. ■ Strategic Policy 10: Quality and Location of Retail Development.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>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. 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.</p> <p>Employment and local economy policies Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations), DM Policy 18 (New Employment Development), DM Policy 19 (Retentions of Existing Employment Sites), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) 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 Draft Local Plan's economic strategy generally focussing on areas of existing activity where effects are already occurring. Furthermore, 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 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 Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) 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>	<ul style="list-style-type: none"> ■ 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. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 34: Community Facilities.
SA5: Natural resources	<p>Climate change DM Policy 3 (Renewable and Low Carbon Energy) has the potential to result in minor adverse effects on this SA objective by virtue of the fact that such energy projects may often be located on greenfield land, resulting in the loss of its other ecosystem services.</p> <p>New home policies Strategic Policy 2 (Housing Growth), 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) and Site Allocations Policy 2 (Land off Alkham Valley Road) and employment and local economy policies Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) are likely to result in significant negative effects on this SA objective. This is because these policies allocate land recognised as some of the country's best and most versatile agricultural land, as well as mineral safeguarding areas and green infrastructure.</p> <p>Employment and local economy policies DM Policy 18 (New Employment Development), DM Policy 23 (New Employment Premises in the Countryside) and DM Policy 24 (Tourism and Tourist/Visitor Accommodation) have the potential to generate minor negative effects against this SA objective. Similarly, this is because the policies facilitate the development of new employment and tourism attractions that have the potential to be developed on</p>	<p>The following policies should help to ensure impacts of DM Policy 3 (Renewable and Low Carbon Energy), the new home and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ 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.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	greenfield land, where there is greater scope to lose natural resources.	<ul style="list-style-type: none"> ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 33: Protection of Open Space. ■ 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. ■ 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. <p>However, beyond minimising the development of greenfield 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 2 (Housing Growth), Strategic Policy 4 (Whitfield Urban Expansion) and Stie Allocations Policy 1 (Housing Allocations) have 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 8 (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. 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 and local economy policies 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) have 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</p>	<p>The following policies should help to ensure impacts of the new homes policies, 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"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 1: Reducing Carbon Emissions. ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 4: Sustainable Travel. ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 10: Quality 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.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>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>Transport and infrastructure policies Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) 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>Transport and infrastructure DM Policy 33 (Protection of Open Spaces) 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"> ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 34: Community Facilities. ■ 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 41: Air Quality. <p>The following policies should help to ensure impacts of DM Policy 33 (Protection of Open Spaces) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 34: Community Facilities. ■ Strategic Policy 15: Place Making. ■ Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites. ■ Strategic Policy 17: Green Infrastructure and Biodiversity.
SA7: Climate change adaptation	<p>New home policies Strategic Policy 2 (Housing Growth) and Site Allocations Policy 1 (Housing Allocations) 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 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>Employment and economic growth policies Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations) and DM Policy 19 (Retention of Existing Employment Sites) have the potential to generate minor adverse effects against this SA objective. This is because the majority of the sites contain flood risk zones and/or land known to be vulnerable to surface water flooding. Furthermore, 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 DM Policy 3 (Renewable and Low Carbon Energy), the new home and employment and local economy policies on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ 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.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
		<ul style="list-style-type: none"> ■ Strategic Policy 11: Dover Town Centre. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 33: Protection of Open Space. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ 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. ■ 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.
SA8: Climate change mitigation	<p>New homes policies Strategic Policy 2 (Housing Growth), Site Allocations Policy 1 (Housing Allocations) and Site Allocations Policy 2 (Land off Alkham Valley Road) have 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 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>Employment and local economy policies Strategic Policy 8 (Economic Growth), Strategic Policy 9 (Employment Allocations), DM Policy 18 (New Employment Development), DM Policy 19 (Retentions of Existing Employment Sites), DM Policy 22 (Conversion or Rebuild of Rural Buildings for Economic Development Purposes) and DM Policy 23 (New Employment Premises in the Countryside) 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 Draft Local Plan's economic strategy generally focussing on areas of existing activity, rather than creating new areas of intense economic activity. Furthermore, 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 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.</p>	<p>The following policies should help to ensure impacts of the new homes policies, 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"> ■ 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. ■ DM Policy 21: Home Working. ■ DM Policy 24: Tourism and Tourist/Visitor Accommodation. ■ Strategic Policy 10: Quality and Location of Retail Development. ■ Strategic Policy 11: Dover Town Centre. ■ Strategic Policy 12: Deal and Sandwich Town Centres.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>Transport and infrastructure policies Strategic Policy 14 (Strategic Highway Infrastructure), DM Policy 29 (The Highway Network and Highway Safety) and DM Policy 30 (Parking Provision on New Development) 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>Transport and infrastructure DM Policy 33 (Protection of Open Spaces) 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 carbon sequestration, may be lost for development.</p>	<ul style="list-style-type: none"> ■ DM Policy 25: Primary Shopping Areas. ■ DM Policy 26: Sequential Test and Impact Assessment ■ DM Policy 27: Local Centres. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 34: Community Facilities. ■ DM Policy 36: Achieving High Quality Design. ■ 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 41: Air Quality. <p>The following policies should help to ensure impacts of DM Policy 33 (Protection of Open Spaces) on this SA objective are effectively managed through the Plan period:</p> <ul style="list-style-type: none"> ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 34: Community Facilities. ■ Strategic Policy 15: Place Making. ■ Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites. ■ Strategic Policy 17: Green Infrastructure and Biodiversity.
SA9: Biodiversity	<p>Climate change DM Policy 3 (Renewable and Low Carbon Energy) 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 home policies 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), Site Allocations Policy 2 (Land off Alkham Valley Road), 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</p>	<p>The following policies should help to ensure impacts of the climate change DM Policy 3 (Renewable and Low Carbon Energy), new homes policies, 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"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 2: Sustainable Design and Construction.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>Occupation) have the potential to generate significant negative or minor negative effects against this SA objective. This is in acknowledgement of the findings of the Habitats Regulations Assessment (HRA) of the Draft Local Plan, covering the fact 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>Employment and local economy policies 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) and DM Policy 24 (Tourism and Tourist/Visitor Accommodation) have the potential to generate significant negative or minor negative effects against this SA objective. Again, this is in acknowledgement of the findings of the HRA of the Draft Local Plan, covering the fact that some of the employment allocations are located in close proximity to European Ecological Sites and Sites of Special Scientific Interest (SSSIs) and fall within their Impact Risk Zones defined by Natural England. Furthermore, the more general policies setting out the scenarios in which rural or tourism-focussed employment development might be permitted do not rule out the potential for some adverse effects on the District's natural environment being acceptable.</p> <p>Transport and infrastructure DM Policy 33 (Protection of Open Spaces) 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 16 (Protecting the District's Hierarchy of Designated Environmental Sites) 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"> ■ 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. ■ Strategic Policy 11: Dover Town Centre. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ DM Policy 33: Protection of Open Space. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ 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. ■ 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. <p>The vast majority of the same policies are likely to help effectively manage any potential impacts permitted by Strategic Policy 16 (Protecting the District's Hierarchy of Designated Environmental Sites).</p>
SA10: Historic environment	<p>Climate change policies Strategic Policy 1 (Planning for Climate Change), DM Policy 1 (Reducing Carbon Emissions) and DM 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 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), Site Allocations Policy 2 (Land off Alkham Valley Road), 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) 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 in close proximity to known historic assets or within historic landscapes or townscapes. Although the allocations generally make reference to the need for</p>	<p>The following policies should help to ensure impacts of the climate change policies, new homes policies, 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"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 6: Flood Risk. ■ DM Policy 7: Surface Water Management. ■ DM Policy 8: Coastal Change Management Areas.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>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. Furthermore, 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>Employment and local economy policies 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) and DM Policy 24 (Tourism and Tourist/Visitor 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 in close proximity to known historic assets or within historic landscapes or townscapes. Although the allocations generally in existing employment areas, there is still potential to affect the significance of known and unknown historic assets directly or indirectly. Furthermore, the more general policies setting out the scenarios in which rural or tourism-focussed employment development might be permitted do not rule out the potential for some adverse effects on the District's historic environment being acceptable.</p> <p>Transport and infrastructure DM Policy 33 (Protection of Open Spaces) 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 open land which makes a contribution to the setting and special character of the District's historic environment.</p> <p>Historic environment DM Policy 44 (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"> ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 10: Quality 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 28: Shop Fronts. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites. ■ Strategic Policy 17: Green Infrastructure and Biodiversity. ■ Policy 39: Landscape Character. ■ 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. ■ DM Policy 48: Historic Parks and Gardens. <p>The vast majority of the same policies are likely to help effectively manage any potential impacts permitted by DM Policy 44 (Designated and Non-designated Heritage Assets).</p>
SA11: Landscape and townscape	<p>Climate change DM Policy 3 (Renewable and Low Carbon Energy) 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 adversely affect the setting and special character of the District's sensitive landscapes, townscapes and seascapes.</p> <p>New home policies 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), Site Allocations Policy 2 (Land off Alkham Valley Road), 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) have the potential to generate minor negative effects</p>	<p>The following policies should help to ensure impacts of the climate change DM Policy 3 (Renewable and Low Carbon Energy), new homes policies, 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"> ■ Strategic Policy 1: Planning for Climate Change. ■ DM Policy 2: Sustainable Design and Construction. ■ DM Policy 6: Flood Risk.

SA objective	Potential negative effects of the Draft Local Plan Policies ³²	Potential Mitigation of Draft Local Plan Policies
	<p>against this SA objective. 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. Furthermore, 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/historic environment being acceptable.</p> <p>Employment and local economy policies 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) and DM Policy 24 (Tourism and Tourist/Visitor Accommodation) have the potential to generate minor negative effects against this SA objective. This is in acknowledgement of the fact that some of the employment allocations are located in close proximity to known sensitive landscape and townscape assets. Although the allocations are generally in existing employment areas, there is still the potential for additional adverse effects on visual setting or more directly through noise, light, water and air pollution. Furthermore, the more general policies setting out the scenarios in which rural or tourism-focussed employment 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>Transport and infrastructure DM Policy 33 (Protection of Open Spaces) 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 open land which makes a contribution to the setting and special character of the District's landscapes, townscapes and seascapes.</p>	<ul style="list-style-type: none"> ■ DM Policy 7: Surface Water Management. ■ DM Policy 8: Coastal Change Management Areas. ■ DM Policy 9: Tree Planting and Protection. ■ Strategic Policy 10: Quality 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 28: Shop Fronts. ■ Strategic Policy 13: Infrastructure and Developer Contributions. ■ DM Policy 31: Providing Open Space. ■ Strategic Policy 15: Place Making. ■ DM Policy 36: Achieving High Quality Design. ■ Strategic Policy 16: Protecting the District's Hierarchy of Designated Environmental Sites. ■ Strategic Policy 17: Green Infrastructure and Biodiversity. ■ DM Policy 39: Landscape Character. ■ 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. ■ DM Policy 48: Historic Parks and Gardens.

6.575 In addition to the mitigation provided by the policies in the Draft 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. Furthermore, strategic site allocations set out in 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) have or are in the process of developing updated masterplan documents that will be

published as Supplementary Planning Documents alongside the new Local Plan and be a material consideration in the determination and monitoring of the allocations' planning applications.

6.576 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 Draft Local Plan. Mitigation may include planning conditions requiring: noise and dust impact assessments; air quality assessments; ecological

assessments; hydrological/hydrogeological assessments; flood risk assessments; landscape and visual impact assessments; separation distances/buffer zones between the development and sensitive receptors; phasing of sites 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 and high quality restoration of sites.

Habitats Regulations Assessment

6.577 At the Screening stage, Likely Significant Effects (LSEs) on European sites, either alone or in combination with other policies and proposals, were identified for Draft Local Plan policies:

- 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
- Strategic Policy 9: Employment Allocations

6.578 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, Stodmarsh SPA and Ramsar and Dungeness, Romney Marsh and Rye Bay pSPA.
- Non-physical disturbance – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar.
- 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, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC, Stodmarsh SPA and Ramsar, Thanet Coast SAC, Blean Complex SAC, Margate and Long Sands and Outer Thames Estuary.
- Water quantity and quality – in relation to Sandwich bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar and Stodmarsh SAC, SPA and Ramsar.

6.579 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 (AEol) of the European sites either alone or in-combination with other plans or projects. The Appropriate Assessment concluded that no AEol 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 providing that the Local Plan requires wintering bird surveys are 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 providing the wording in Strategic Policy 16: Protecting the Districts Hierarchy of Designated Environment Sites and Strategic Policy 17 (Green Infrastructure and Biodiversity) include specific detail on the requirement to protect European sites from AEol, such as a commitment for development within 500m of the SPA and Ramsar to demonstrate through a project level assessment that no AEol 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 providing visitor monitoring surveys continue to be updated, new natural green space and green infrastructure are provided and financial contributions for mitigation are sought from site allocations proposed within 9km of the Thanet Coast and Sandwich Bay SPA and Ramsar. Large developments within the Zone of Influence (Zol) of European sites should also undertake a project-level HRA to define appropriate mitigation measures and demonstrate no AEol will be generated by the development. In addition to satisfy the requirements of the HRA, it is recommended that the Thanet Coast and Sandwich Bay SPA Mitigation Strategy is sufficiently detailed and agreed with Natural England prior to adoption of the plan.

6.580 At this stage and in line with a precautionary approach, AEoI cannot be ruled out in relation to water quantity and quality effects on Stodmarsh SAC, SPA and Ramsar. Further information is required to determine the potential impacts alone and in-combination with other plans and policies in relation to Stodmarsh SAC, SPA and Ramsar.

6.581 In relation to water quantity and quality, it is understood that Dover District Council has commissioned a hydrological specialist to advise on the hydrological connectivity of the District to the Stodmarsh SAC, SPA and Ramsar. If hydrological connectivity is found, then nutrient calculations will be required for any site allocation proposed within the Little Stour and Wingham Catchment or which discharges into a WwTW in this catchment to demonstrate nutrient neutrality. This may require appropriate mitigation measures to demonstrate this.

6.582 Like the SA, the HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees.

Duration of effects

6.583 The Draft 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 Draft Local, 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:

6.584 Most of the effects will be long-term, in that the Draft 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).

6.585 The effects which have been identified in the appraisal of the Draft 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

6.586 The impacts of the Draft 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 wellbeing, 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 Draft Local Plan or reversed through restoration measures in the long-term.

Medium-term effects

6.587 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 wellbeing, 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 Draft Local Plan when planning proposals are assessed and determined by the District Council.

Long-term effects

6.588 Long-term, permanent benefits that would result from the Draft 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 as the conservation of the District's landscapes and historic environment. Long-term, permanent negative impacts of the Draft 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 fully implemented towards the end of the Plan period.

Secondary, cumulative and synergistic effects

6.589 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.

6.590

Table 6.12 summarises the net effect of the Draft 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

6.591 The Draft 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 Draft 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, wellbeing, recreation and integration

6.592 The Draft 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, Eynthorne 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.

6.593 The Draft 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 Draft 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.

6.594 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

6.595 The Draft 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 Draft Local Plan also aims to deliver significant economic growth in the District's economic centres, including in and around Dover and Sandwich. The Draft Local Plan is therefore likely to generate a significant positive effect against this SA objective.

SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion

6.596 The Draft 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, Eynthorne 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 Draft Local Plan also sets out a framework for making sure new developments contribute to the infrastructure requirements they generate. The Draft Local Plan is therefore likely to generate a significant positive effect against this SA objective.

6.597 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.

6.598 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. 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

6.599 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. Therefore, the Draft Local Plan is likely to generate significant negative effects against this SA objective. However, the Draft 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

6.600 The Draft Local Plan is considered likely to generate a combination of minor positive and minor negative effects against this SA objective. This is because the Draft 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 fuels by fossil fuels.

6.601 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

6.602 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 Draft 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.

6.603 There are also policies which prioritise investment in and the enhancement of the District's green infrastructure network and water quality and supply.

6.604 Therefore, overall, the Draft 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

6.605 The Draft 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.

6.606 Furthermore, the Draft 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 Draft Local Plan is therefore likely to generate a significant positive effect 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.

6.607 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.

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

6.608 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.

6.609 The Draft 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 Draft 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.

6.610 Therefore, at this stage in the plan-making process, overall, the Draft 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

6.611 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 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.

6.612 However, the Draft 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 Draft 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

6.613 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.

6.614 However, the Draft 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 Draft Local Plan is considered likely to generate mixed minor positive and minor negative effects against this SA objective.

Table 6.12: Secondary, cumulative and synergistic effects of the Draft Local Plan

SA objective	Effects
SA1: Housing	++/- Mixed significant positive and minor negative effects likely
SA2: Health and wellbeing	++/- Mixed significant positive and minor negative effects likely
SA3: Employment	++ Significant positive effect likely
SA4: Travel	++/- Mixed significant positive and minor negative effects likely
SA5: Natural resources	--/+ Mixed significant negative and minor positive effects likely
SA6: Air pollution	+/- Mixed minor effects likely
SA7: Climate change adaptation	+/- Mixed minor effects likely
SA8: Climate change mitigation	++/- Mixed significant positive and minor negative effects likely
SA9: Biodiversity	--/+ Mixed significant negative and minor positive effects likely
SA10: Historic environment	+/- Mixed minor effects likely
SA11: Landscape and townscape	+/- Mixed minor effects likely

Cumulative effects at the settlement level

6.615 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:

- Ash (six site allocations delivering 272 new homes in total);
- Aylsham (four site allocations delivering 1,166 new homes in total, of which two are strategic allocations, one to the north of Aylesham for 500 homes and one to the south of Aylesham for 640 homes, plus a new employment site south of Aylesham, known as Aylesham Development Area);

- Capel le Ferne (four site allocations delivering 93 new homes in total);
- East Langdon (site allocations delivering new homes in total);
- Eastry (three site allocations delivering 120 new homes in total);
- Elvington and Eythorne (four site allocations delivering 426 new homes in total, of which one is a strategic allocation for 350 homes, known as Eythorne and Elvington Local Centre, plus the allocation of the existing employment site at Pike Road Industrial Estate);
- Kingsdown (although only one site is allocated it is relatively large delivering 90 new homes in total);
- Northbourne (although only one site is allocated it is relatively large given the remote location of Betteshanger Colliery delivering 210 new homes in total);
- Preston (three site allocations delivering 122 new homes in total);
- Shepherdswell (four site allocations delivering 170 new homes in total);
- St Margaret's at Cliffe (three site allocations delivering 46 new homes in total);
- Wingham (three site allocations delivering 78 new homes in total);
- Woodnesborough (two site allocations delivering 15 new homes in total); and

- Worth (two site allocations delivering 30 new homes in total, plus the allocation of the existing employment site at the Worth Centre).

6.616 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.

6.617 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

6.618 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 Draft Local Plan also interact with the effects of the development and infrastructure planned at the County level by Kent County Council.

6.619

6.620 Table 6.13 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.

Table 6.13: 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) ³³	2011 to 2031	Approximately 16,000 dwellings.	Approximately 125,000sqm.	N/A
Folkestone and Hythe Places and Policies Local Plan (Adopted September 2020) ³⁴	2020 - 2037	Minimum of 13,284 dwellings	Approximately 68,000sqm.	Otterpool Park is a proposed new garden town north west of Folkestone on the M20 and HS1 railway line. It will provide a minimum of 5,925

³³ Canterbury Local Plan (Adopted July 2017) Available at: https://www.canterbury.gov.uk/downloads/file/868/canterbury_district_local_plan_adopted_july_2017

³⁴ Folkestone & Hythe District Council. Places and Policies Local Plan. (Adopted September 2020) Available at: https://www.folkestone-hythe.gov.uk/media/2969/Places-and-Policies-Local-Plan-2020/pdf/Places_and_Policies_Local_Plan_2020.pdf?m=637370773065900000

Project / Plan	Time Period	Housing Growth	Employment Growth	Strategic Infrastructure
Folkestone and Hythe Core Strategy Review (Submitted February 2020) ³⁵				new homes and approximately 36,700 sqm net of employment floorspace (B use classes) by 2037. ³⁶
Thanet Local Plan (Adopted July 2020) ³⁷	2020 to 2031	A minimum of 17,140 dwellings	A minimum of 5,000 additional jobs	N/A
Kent Minerals and Waste Local Plan (Adopted September 2020) ³⁸	2013 to 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 ³⁹	Estimated 2022 - 2028	N/A	N/A	The Lower Thames Crossing is a proposed Nationally Significant Infrastructure Project (NSIP) connecting Kent to Essex east of Gravesend and Tilbury. The project would include the longest road tunnel in the UK, stretching 2.6 miles, 14.3 miles of new road and roughly new bridges and viaducts.
Dover Western Docks Revival / Port Expansion ⁴⁰	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.
Bifurcation of Port traffic (M2/M20) and A299/A249 ⁴¹	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.

³⁵ Folkestone & Hythe District Council. Core Strategy Review. (Submitted February 2020) Available at: [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)

³⁶ Folkestone & Hythe District Council. Core Strategy Review. (February 2020) Available at: [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)

³⁷ Thanet Local Plan (Adopted September 2020) Available at: <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1-1.pdf>

³⁸ Kent Minerals and Waste Local Plan (Adopted September 2020) Available at: <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>

³⁹ 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

⁴⁰ 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

⁴¹ 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

Project / Plan	Time Period	Housing Growth	Employment Growth	Strategic Infrastructure
Manston Airport Expansion ⁴²	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.

6.621 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, the District's 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.

6.622 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.

6.623 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.

6.624 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.

6.625 In addition, work is under way to construct 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.

6.626 Overall, relative to the scale of housing and employment growth across the area and associated highways, waste and minerals infrastructure investment, the Draft Local Plan is not likely to significantly affect the significance or distribution of environmental, social and economic effects across the area as a whole.

6.627 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.

⁴² RSP. Building a strong economic future in Kent. Available at: <https://rsp.co.uk/reopening-manston/>

Chapter 7

Conclusions and next steps

Conclusions

7.1 This SA report has been prepared to accompany the Regulation 18 Consultation for the Dover District Draft Local Plan. The SA has sought to identify significant effects emerging from the Draft Local Plan in line with the SEA Regulations.

7.2 The Draft Local Plan sets out a strategy that meets the District's housing needs as well as its aspirations for economic growth. A minimum of 11,920 new homes are to be delivered over the Plan period, which roughly equates to a 22% increase in the total number of homes in Dover District.

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

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

7.5 The Draft 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 Draft Local Plan are likely to be particularly evident.

7.6 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 other benefits, such as the inclusion of new and improved facilities, services, green infrastructure and public transport networks.

7.7 The Draft 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 Draft Local Plan also has potential to have significant adverse effects on the District's natural resources, landscape and townscape, biodiversity and historic assets.

7.8 Generally, the preferred growth strategy, spatial strategy and policy options perform better than or similar to the reasonable alternatives tested, but several policy recommendations have been made to improve the sustainability performance of the Draft Local Plan.

7.9 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 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.

7.10 There is some uncertainty as to whether significant adverse effects on the integrity of ecological assets can be adequately avoided and or mitigated at this stage in the plan-making process. However, the Council has commissioned suitable studies to thoroughly explore these potential effects and inform the next iteration of the Dover Local Plan and its Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

Next steps

7.11 This SA Report will be available for consultation alongside the Draft Local Plan between January and March 2021.

7.12 After the public consultation, another SA Report will be produced for consultation alongside the proposed submission version of the Dover District Local Plan before the Local Plan is submitted for examination.

7.13 All consultation comments on the SA process and its findings will be reviewed and before any further SA work is carried out. A schedule containing a summary of the consultation comments of relevance to the SA and appropriate responses will be produced and included in the next SA Report.

LUC

December 2020

Appendix A

SA scoping consultation comments

Table A.1: Representations on Dover Local Plan SA Scoping Report

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
Ash Parish Council		
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. Their specific comments are made in relation to the following parts of the Scoping Report:	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.
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.	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.
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.	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.
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.	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.
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 para 2.48. An additional reference has been added to Chapter 4.

Appendix A
SA scoping consultation comments
Draft Dover District Local Plan (Reg 18) Sustainability Appraisal
December 2020

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
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.
Environment Agency		
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 (see page 7, Table 1 of https://www.gov.uk/government/publications/water-stressed-areas-2013-classification).	Chapter 5 – Air, land and water quality – paragraph 5.41	With regard to paragraph 5.41, the paragraph has been updated accordingly.
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	SA Objective 7 (Tables 10.1)	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?' 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

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
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.		undesigned ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?' 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'.
The following watercourses have been excluded from this section: the North Stream, South Stream, Delf, Penfield Sewer, Brook Stream and the Minnis Sewer. The Environment Agency questions whether there is some confusion over the meaning of 'main river'. Clarification required.	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.
'Fowlmean County Park' should be 'Fowlmead Country Park'. 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.	Chapter 7 – Biodiversity – paragraph 7.25	With regard to paragraph 7.25, the paragraph has been amended.
Highways Agency		
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. 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". Highways England supports the fact that the sites will be considered cumulatively, as well as in their own right. 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.	SA Objective 4 (Tables 10.1)	Noted.
Historic England		
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.	General comment.	Noted.

Appendix A
SA scoping consultation comments
Draft Dover District Local Plan (Reg 18) Sustainability Appraisal
December 2020

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
<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 subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p>		
Kent County Council		
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)⁴³ 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>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>	Chapter 8 – Historic environment	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.

⁴³ <http://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public/SingleResult.aspx?uid=TKE1046>

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
<p>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 Assessment⁴⁴, 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)⁴⁵ 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>	Chapter 9 – Landscape	<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 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</p>	Table A1.2 – Environmental Site Assessment Criteria	<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>

⁴⁴ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/countryside-policies-and-reports/kents-landscape-assessment>

⁴⁵ https://www.kent.gov.uk/data/assets/pdf_file/0017/56312/Kent-Historic-Landscape-Character-volume-3.1.pdf

Consultation Comment	SA Scoping Report Reference	Response / Action Taken
assessment should be considered as part of the more general site assessment proposed in this report.		
Kent County Council Public Rights of Way (PROW) and Access Service		
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.	Policy Context	The policy context sections to Chapters 2 and 4 have been updated to include reference to the Kent ROWIP.
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. 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.	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		
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.

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.

B.3 European Environmental Noise Directive (2002): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

National

B.4 National Planning Policy Framework (NPPF)⁴⁶ 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

⁴⁶ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

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 72 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.

B.5 National Planning Policy Guidance (NPPG)⁴⁷ 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 Select Committee on Public Service and Demographic Change report Ready for Ageing⁴⁸: 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.7 Fair Society, Healthy Lives⁴⁹: 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”.

B.8 Planning Policy for Traveller Sites⁵⁰: 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.9 Planning for the Future White Paper⁵¹: 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.

⁴⁷ Ministry of Housing, Communities and Local Government (2019) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/guidance/health-and-wellbeing>

⁴⁸ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at: <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>

⁴⁹ The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at: <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

⁵⁰ Department for Communities and Local Government (2015) Planning policy for traveller sites [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁵¹ Department for Housing, Communities and Local Government (2020) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

B.10 Laying the foundations: a housing strategy for

England⁵²: Aims to provide support to deliver new homes and improve social mobility.

B.11 Healthy Lives, Healthy People: Our strategy for

public health in England⁵³: 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.12 A Green Future: Our 25 Year Plan to Improve the

Environment⁵⁴: 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.

Sub-national

B.13 Kent and Medway Growth and Infrastructure

Framework (GIF)⁵⁵: 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:

- 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.14 The GIF summarises the need for future infrastructure projects in Dover, including major housing developments (Dover Port, Town Centre and Seaford, Whitfield and Discovery Park in Sandwich).

⁵² HM Government (2011) Laying the Foundations: A Housing Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

⁵³ HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf

⁵⁴ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

⁵⁵ Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework Update [online] Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

B.15 East Kent Growth Framework⁵⁶: 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.16 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.17 Lighting the way to success: The EKLSP Sustainable Community Strategy⁵⁷: 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 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.18 Kent Rights of Way Improvement Plan⁵⁸: 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.

⁵⁶ East Kent Regeneration Board (2018) East Kent Growth Framework [online] Available at: <http://kmep.org.uk/news/info-page/east-kent-growth-framework-march-2018>

⁵⁷ East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLSP Sustainable Community Strategy [online] Available at: [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Document-Ref-](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)

[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_the_Way_to_Success_The_EKLSP_Sustainable_Community_Strategy_(Document_Ref_A85).pdf)

⁵⁸ Kent County Council Kent Rights of Way Improvement Plan [online] Available at: <https://www.kent.gov.uk/about-the-Council/strategies-and-policies/environment-waste-and-planning-policies/countryside-policies-and-reports/public-rights-of-way-improvement-plan>

Current baseline

Population

B.19 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 2018 the population of Dover was 116,969 people, the fourth smallest local authority population in Kent⁵⁹. The working age population of Dover was 69,300 people⁶⁰.

B.20 In the future, over the period 2018-2043 the projections show that the population of Dover District will increase from 116,969 to 141,067 people. This is predominantly due to domestic migration flows, as natural change is negative (i.e. more deaths than births)⁶¹.

B.21 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 UK⁶².

B.22 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 2028⁶³.

Gypsy, traveller and travelling showpeople

B.23 The updated East Kent Gypsy, Traveller and Travelling Showpeople Accommodation Assessment found that there is a need for a total of 48 pitches in Dover District between 2014 and 2037⁶⁴. However, if consideration is given to potential turnover and opportunities for additional capacity, this would result in a residual need for 12 pitches.

Housing

B.24 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 Town⁶⁵. The mean price of dwellings in Dover District was £249,427 in May 2020, higher than the national level (£235,673) but lower than the regional level (£324,659) and County level (£297,195)⁶⁶.

B.25 The 2011 Census showed that the number of households in Dover District increased by 9% since 2001, reaching 48,310 households in total. This compares to the regional average of 8.2% and the national figure of 7.9%. In the District the number of households rose at a faster rate than the population in households between 2001 and 2011. This implies that the average size of households is falling across the District. The same trend is recorded regionally and nationally⁶⁷.

B.26 The 2011 Census also showed that there were more single person households and few couple households with dependent children in the District than recorded regionally and nationally. 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 suggested that household formation rates amongst young adults may have reduced⁶⁸.

B.27 The 2011 Census indicated that 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

⁵⁹ ONS (2020) Subnational population projections for England: 2018-based projections [online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based#change-by-region>

⁶⁰ Dover District Council (2020) Dover District Summary [online] Available at: <https://www.dover.gov.uk/Corporate-Information/Facts-and-Figures/PDF/FINAL-Dover-District-Summary.pdf>

⁶¹ ONS (2020) Subnational population projections for England: 2018-based projections [online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based#change-by-regionprojections>

⁶² ONS (2020) Subnational population projections for England: 2018-based projections [online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based#change-by-region>

⁶³ ONS (2020) Subnational population projections for England: 2018-based projections [online] Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based#change-by-region>

⁶⁴ Arch4 (2020) Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Update [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Housing.aspx>

⁶⁵ Peter Brett Associates (2017) Strategic Housing Market Assessment (Parts 1 and 2) [online] Available at: <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>

⁶⁶ UK House Price Index [online] Available at: <http://landregistry.data.gov.uk/app/ukhpi>

⁶⁷ Peter Brett Associates (2017) Strategic Housing Market Assessment (Parts 1 and 2) [online] Available at: <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>

⁶⁸ Dover District Council (2017) Dover District: Authority Monitoring Report 2016/2017 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2016-17.pdf>

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%)⁶⁹.

B.28 The District's Strategic Housing Market Assessment (SHMA) (Partial Update 2020)⁷⁰ which underpins this Local Plan recommends an OAN of 630 dpa (12,600 dwellings) over the period 2020-2040. More specifically, the OAN projections indicate that the population aged 65 or over is going to increase drastically over this period. The SHMA concludes a tenure split of 73.1% Market Housing, 16.0% Affordable/Socially Rented Housing 5.8% Shared Ownership.

B.29 A Whole Plan Viability Assessment⁷¹ (2020) undertaken alongside preparation of the Draft 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.30 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 average⁷². The percentage of working age residents with NVQ 4 qualifications increased from 34.6% to 36.5%, between 2017 and 2018 respectively, falling to 33.3% in 2019⁷³.

B.31 The Kent and Medway Growth and Infrastructure Framework (GIF)⁷⁴ highlights significant capacity issues at primary schools around Dover and Deal (although authority-wide surplus). According to the Commissioning Plan for Education Provision in Kent⁷⁵, the number of primary age pupils is expected to continue rising from 136,818 in 2017-18 to 137,975 in 2022-23, but this will decrease to 136,069 in 2032-33. In the same period the number of secondary age

pupils in Kent schools is expected to rise significantly from 90,214 in 2017-18 to 103,052 in 2022-23, which will stay consist with 103,782 in 2032-33. KCC will address these increasing school pupil numbers by expanding existing schools and creating new primary, secondary and special schools.

B.32 The need for additional school places in the County has been recognised by Government with a further £15.5m basic need allocation for 2019-20. The allocation for 2020-21 will not be known until spring 2018. However, price inflation in the construction industry and the sheer number of places, particularly in the secondary sector, continues to make KCC's capital funding challenging and they are presently estimating a shortfall of £101m in respect of places required by 2020.

Deprivation

B.33 The English Indices of Deprivation 2019 reinforce previously identified patterns of deprivation across the District⁷⁶. 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.34 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.35 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 areas⁷⁷.

⁶⁹ Peter Brett Associates (2017) Strategic Housing Market Assessment (Parts 1 and 2) [online] Available at: <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>

⁷⁰ Peter Brett Associates (2019) Strategic Housing Market Assessment (Partial Part 2 Update) [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-SHMA-Partial-Update-with-appendices.pdf>

⁷¹ HDH Planning and Development (2020) Whole Plan Viability Study.

⁷² Dover District Council (2019) Dover District: Authority Monitoring Report 2018/2019 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2018-19.pdf>

⁷³ NOMIS – Official Labour Market Statistics (2019) Labour Market Profile – Dover [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx>

⁷⁴ Kent County Council (2015) Kent and Medway Growth and Infrastructure Framework [online] Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf

⁷⁵ Kent County Council (2020) Commissioning Plan for Education Provision in Kent [online] Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0005/104675/Commissioning-Plan-for-Education-Provision-in-Kent-2020-to-2024.pdf

⁷⁶ UK Government (2019) English Indices of Deprivation 2019 [online] Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁷⁷ Public Health England (2020) Dover District: Health Profile 2019 [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-name=dover>

B.36 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 average⁷⁸.

B.37 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 adults⁷⁹.

Open spaces, sport and recreation

B.38 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.39 With regard to accessible green space, an assessment⁸⁰ 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 1.75 ha of play space for children and young people.

B.40 The Council's Green Infrastructure Strategy⁸¹ 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.41 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 19th July 2016 the first stretches of the Coast Path in Kent, 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 strategy⁸².

B.42 With regard to sport and recreation, the Playing Pitch Strategy⁸³ 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.43 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.44 Kent has the highest crime rate in England and Wales⁸⁴ and , the rate of violent crime in Dover is growing⁸⁵. There has been a steady increase in total annual crimes over the past five years, with 707 crimes recorded in July 2020 compared with 547 in July 2019⁸⁶.

Noise and odour

B.45 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 A21 generate noise and air pollution which has the potential to affect those living in nearby areas, particularly during peak traffic times. Dover 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 terminal⁸⁷. 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

⁷⁸ Public Health England (2020) Dover District: Health Profile 2019 [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->

⁷⁹ Public Health England (2020) Dover District: Health Profile 201 [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->

⁸⁰ Dover District Council (2020) Open Space and Play Standards Paper

⁸¹ Dover District Council (2014) Green Infrastructure Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>

⁸² Dover District Council (2014) Green Infrastructure Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>

⁸³ Dover District Council (2019) Playing Pitch Strategy and Action Plan

⁸⁴ UKCrimeStats (2020) Crime by Subdivision [online] Available at: <https://www.ukcrimestats.com/Subdivisions/>

⁸⁵ Public Health England (2020) Dover District: Health Profile 2019 [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-profiles/2017/e07000108.pdf>

⁸⁶ UKCrimeStats (2020) 'Dover Town, England' [online] Available at: <https://www.ukcrimestats.com/Subdivisions/CED/15140/>

⁸⁷ Dover District Council (2017) 'Getting Around Dover District' [online] Available at: <https://www.dover.gov.uk/Transport,-Streets--Parking/Transport--Streets/Getting-Around.aspx#Rail>

and from London in one hour. There are no airports located within the Dover 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 2019⁸⁸.

⁸⁸ River Oak Strategic Partners (2019) Revised 2.1 Noise Mitigation Plan. Manston Airport Development Consent Order. [online] Available at: [https://infrastructure.planninginspectorate.gov.uk/wp-](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-004719-Noise%20Mitigation%20Plan%20D12%20clean.pdf)

[content/uploads/projects/TR020002/TR020002-004719-Noise%20Mitigation%20Plan%20D12%20clean.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020002/TR020002-004719-Noise%20Mitigation%20Plan%20D12%20clean.pdf)

Figure B.1: Index of Multiple Deprivation

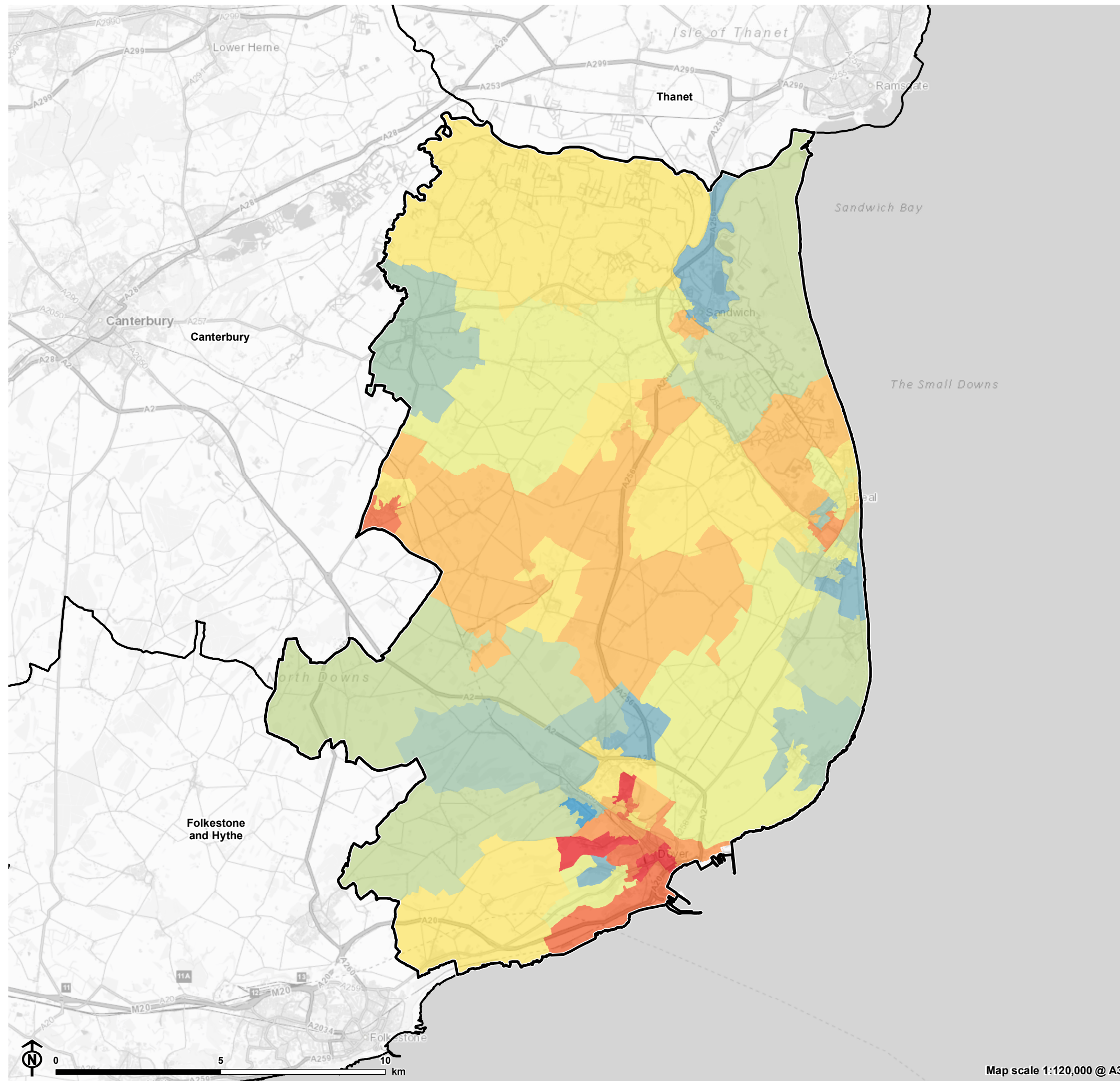
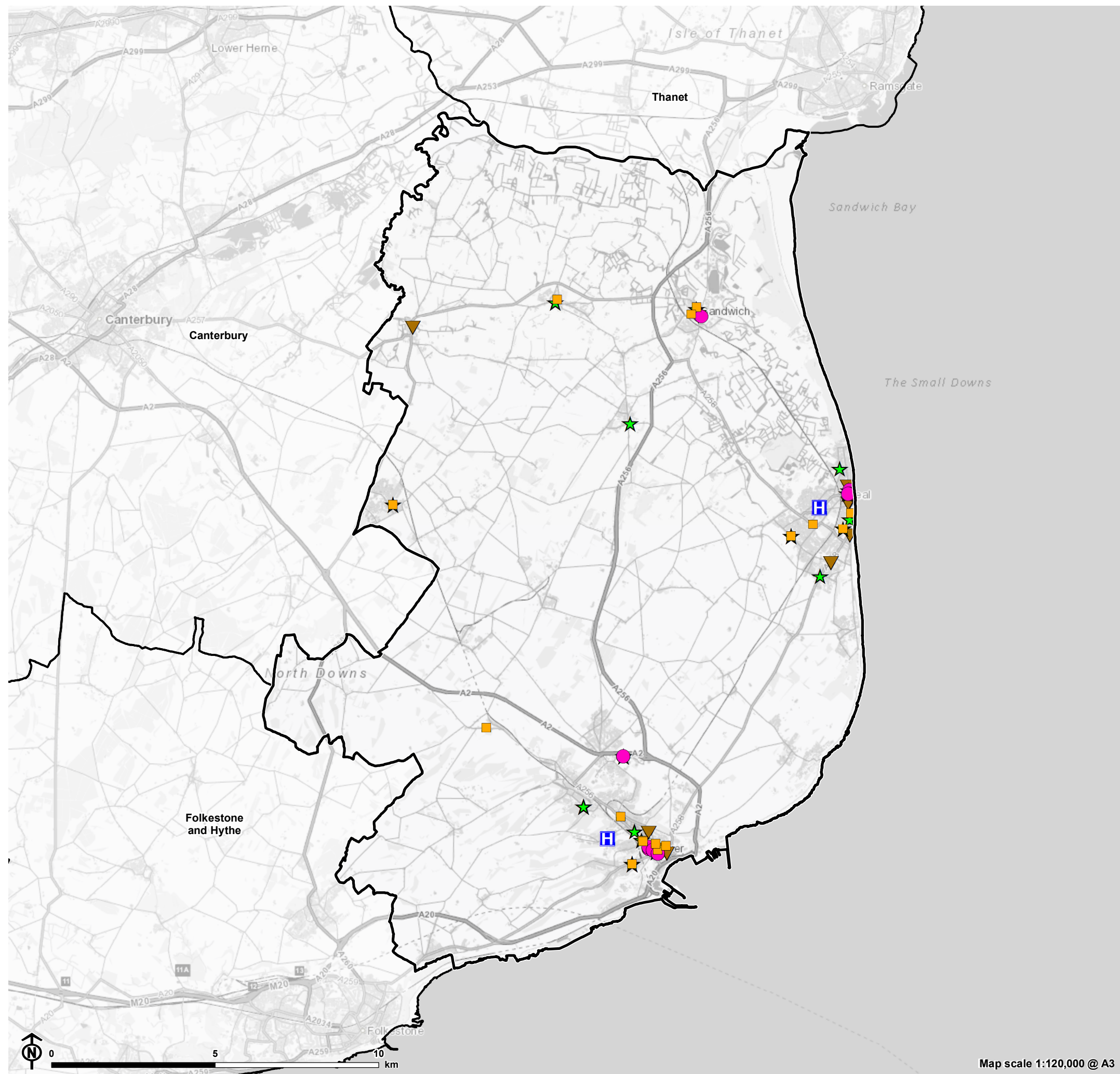


Figure B.2: Services and Facilities



Sustainability issues and likely evolution without the Local Plan

B.46 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.
- 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).
- There are currently capacity issues within Dover and Deal's existing primary schools. 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 questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
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?	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, wellbeing, 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, including those set out in the Kent and Medway Growth and Infrastructure Framework (GIF)? SA 2.2: 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? SA 2.3: 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 and Material Assets

Economy

Policy context

International

B.47 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.48 National Planning Policy Framework (NPPF)⁸⁹ 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.49 National Planning Practice Guidance (NPPG)⁹⁰:

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.50 The Local Growth White Paper (2010)⁹¹: 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.51 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)⁹²: Sets out the Government’s Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities, and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

7.14 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)⁹³:

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.

⁸⁹ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

⁹⁰ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁹¹ Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place’s Potential. Available at:

<https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>

⁹² HM Government (2000) Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England) [online] Available at: <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>

⁹³ LEP Network (2017) Response to the Industrial Strategy Green Paper Consultation: <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>

Sub-national

B.52 Kent and Medway Growth and Infrastructure

Framework (GIF)⁹⁴: 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.53 Lighting the way to success: The EKLSP Sustainable Community Strategy⁹⁵:

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.
- 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.54 East Kent Local Investment Plan 2011-2026⁹⁶:

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:

⁹⁴ Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework Update [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

⁹⁵ East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLSP Sustainable Community Strategy [online] Available at: <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

⁹⁶ East Kent Local Strategic Partnership (2011) East Kent Local Investment Plan 2011-2026 [online] Available at: <https://www2.canterbury.gov.uk/media/160669/appendix-e-local-investment-plan-part-a.pdf>

- 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.

Current baseline

B.55 Dover District represents a reasonably small but productive economy in East Kent. The current major employment locations are the Port of Dover and the various industrial estates around Sandwich.

B.56 Employment floorspace within the District is dominated by industrial uses, with a net gain of 1,964 sqm in 2018/19⁹⁷. Indeed Dover District has the second largest stock of industrial space in East Kent⁹⁸. However, Dover has the second smallest stock of offices in East Kent despite office stock increasing significantly in the last 20 years. This has resulted in a requirement for at least 55,000 square metres office floorspace to 2026 (baseline)⁹⁹.

B.57 Dover District saw a loss of 4,700 jobs across most sectors between 2006 and 2016. The sectors that showed gains in employment were education, hospitality and recreation, finance and insurance, and information and communication.¹⁰⁰ The completion of White Cliffs Business Park meant Dover saw the largest gross gain in storage and distribution across all of employment floorspace uses in 2018/19. The loss of the Co-op store at Deal resulted in the loss of retail floorspace. However, a further 6,723 sqm is coming forward but has not been started on yet¹⁰¹.

B.58 Since the 2001 Census the number of part-time employees in Dover District has increased by 27.5%, and the number of full-time employees has risen by 2%. The number of self-employed residents in Dover District has increased by 33.5%. This pattern is similar to that recorded regionally (a 23.1% increase in part-time employees between 2001 and 2011, compared to a 1.8% rise in full-time employees and a 25.1% increase in those self-employed) and nationally (a 27.1% increase in part-time employees between 2001 and

2011, compared to a 3.6% rise in full-time employees and a 28.4% increase in those self-employed).

B.59 The latest data from NOMIS¹⁰² indicates that the District provides 42,000 jobs which equates to a job density of 0.61, which is significantly below the average for the South-East (0.88). As such, there is now a growing economic divide between the District and the County as a whole. Since January 2013, the unemployment level in Dover District has been consistently higher than the level recorded nationally (1.2%) and the average for the South-East region (1.9%)¹⁰³.

B.60 According to the Employment Land Review¹⁰⁴, Dover's economy is projected to grow modestly to 2026, including growth within the Financial & Business Services, Distribution, Hotels & Catering, Public Sector employment, and Construction alongside a decline in more 'traditional' Manufacturing and Transport & Communications industries. As such, demand for land up to 2026 is driven by requirements for B1 and B8 space. The ELR shows an overall requirement for 56 hectares of B1 land (baseline) and 1.8 hectares of B8 land (baseline). Although an oversupply of employment land up to 2026 has been identified, there is concern over the quality of the supply of land. Indeed, there is limited land that is attractive to the market in the short term, specifically B1 provision.

B.61 The Dover Economic Development Needs Assessment¹⁰⁵ states that a number of employment sites in Dover are no longer considered deliverable in terms of being able to meet business needs. It therefore suggests that some of the District's sites would benefit from greater clarity in planning policy terms, such as White Cliffs Business Park.

B.62 In general the District is considered to be relatively self-contained with market areas and flows generally not extending too far beyond the authority boundary. It does however share some economic linkages with surrounding areas and centres, including adjoining Folkestone and Hythe, Canterbury and Thanet¹⁰⁶.

B.63 The Kent Environment Strategy¹⁰⁷ sets out a strategy for the economy and environment in Kent and considers the

⁹⁷ Dover District Council (2019) Dover District: Authority Monitoring Report 2018/19 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2018-19.pdf>

⁹⁸ Dover District Council (2017) Dover District: Authority Monitoring Report 2016/2017 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2016-17.pdf>

⁹⁹ GVA Grimley (2009) Employment land Review [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Employment-Land-Review-April-2009.pdf>

¹⁰⁰ Dover District Council (2017) Dover District: Authority Monitoring Report 2016/2017 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2016-17.pdf>

¹⁰¹ Dover District Council (2019) Dover District: Authority Monitoring Report 2018/19 [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2018-19.pdf>

¹⁰² NOMIS – Official Labour Market Statistics (2019) Labour Market Profile – Dover [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabeinaact>

¹⁰³ NOMIS – Official Labour Market Statistics (2019) Labour Market Profile – Dover [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx>

¹⁰⁴ GVA Grimley (2009) Employment land Review [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Employment-Land-Review-April-2009.pdf>

¹⁰⁵ Lichfields (2017) Dover Economic Development Needs Assessment – Final Report [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Final-Report-01.03.17.pdf>

¹⁰⁶ Lichfields (2017) Dover Economic Development Needs Assessment – Final Report [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Final-Report-01.03.17.pdf>

¹⁰⁷ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

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.64 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.

B.65 Finally, 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.66 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 in 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.

Sustainability issues and likely evolution without the Local Plan

B.67 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 in the A2 Corridor and 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.2: Economy SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA 3: To deliver and maintain sustainable and diverse employment opportunities.	<p>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?</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>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?</p> <p>SA 3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?</p> <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 the District's existing and future employer needs?</p>	Population, Human Health and Material Assets

Transport connections and travel habits

Policy context

International

B.68 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.69 National Planning Policy Framework (NPPF)¹⁰⁸: 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.70 National Planning Practice Guidance (NPPG)¹⁰⁹: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

B.71 Door to Door: A strategy for improving sustainable transport integration¹¹⁰: 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:

- 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.72 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.73 Department for Transport, Road Investment Strategy 2: 2020-2025¹¹¹: 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.

Sub-national

B.74 Lighting the way to success: The EKLSP Sustainable Community Strategy¹¹²: 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.75 Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031¹¹³: Sets out Kent County Council's Strategy and Implementation Plans for local transport

¹⁰⁸ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁰⁹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

¹¹⁰ Department for Transport (2013) Door to Door: A strategy for improving sustainable transport integration [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf

¹¹¹ Department for Transport (2020) Road Investment Strategy 2: 2020-2025: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872252/road-investment-strategy-2-2020-2025.pdf

¹¹² East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLSP Sustainable Community Strategy [online] Available at: [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)

¹¹³ Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

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.76 Kent and Medway Growth and Infrastructure

Framework (GIF)¹¹⁴: 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.

B.77 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.78 The Kent Design Guide¹¹⁵: 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.79 Kent Rights of Way Improvement Plan¹¹⁶ (2018-2028):

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.80 Dover Transport Strategy¹¹⁷: 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).

¹¹⁴ Kent County Council (2018) Kent and Medway Growth and Infrastructure Framework Update [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf

¹¹⁵ Kent Design Initiative (2008) The Kent Design Guide [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0014/12092/design-guide-foreword.pdf

¹¹⁶ Kent County Council Kent Rights of Way Improvement Plan (2018-2028) [online] Available at: <https://www.kent.gov.uk/waste-planning-and-land/public-rights-of-way/projects#tab-1>

¹¹⁷ Dover District Council & Partners (2007) Dover Transport Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>

- Coordinated traffic signal control.
- Improved accessibility for pedestrians and cyclists, including major new Townwall Street crossing.
- A strong transport awareness and behavioural change programme.

B.81 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.82 Deal Transportation Model: 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.83 Active Travel Strategy¹¹⁸: 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.84 Kent is currently facing increased congestion, on both road and rail. Major routes such as the M20/A20, M2/A2 and A21 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 also¹¹⁹.

B.85 The Kent Environment Strategy¹²⁰ 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.86 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.87 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.88 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 area¹²¹.

B.89 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 find a solution to alleviate pressure on the road network called 'Operation Stack'.

B.90 The Council has commissioned WSP to carry out traffic modelling in the District,¹²² 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 strategic allocations and general traffic alleviations schemes, such as

¹¹⁸ Kent County Council (2016) Active Travel Strategy [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf

¹¹⁹ Kent County Council (2017) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

¹²⁰ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

¹²¹ Kent County Council (2017) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

¹²² WSP (2020) Dover and Deal Transport Model Forecasting Methodology Report.

the A20 improvement scheme and the proposed new link road with Albert Road. The model outputs are yet to be published.

Rail network

B.91 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 capacity¹²³. Indeed the Growth and Infrastructure Framework¹²⁴ 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 Station¹²⁵.

Bus network

B.92 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 car¹²⁶. 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 Hamlets¹²⁷.

B.93 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.94 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.95 According to the Dover District Cycling Plan¹²⁸, 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 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.96 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.97 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.98 Many residents that live in Dover commute into X.

B.99 As set out in **Figure B3**, around 9,977 individuals commute into Dover District, whilst 17,099 commute 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.

¹²³ Kent County Council (2017) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

¹²⁴ Kent County Council (2015) Kent and Medway Growth and Infrastructure Framework [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf

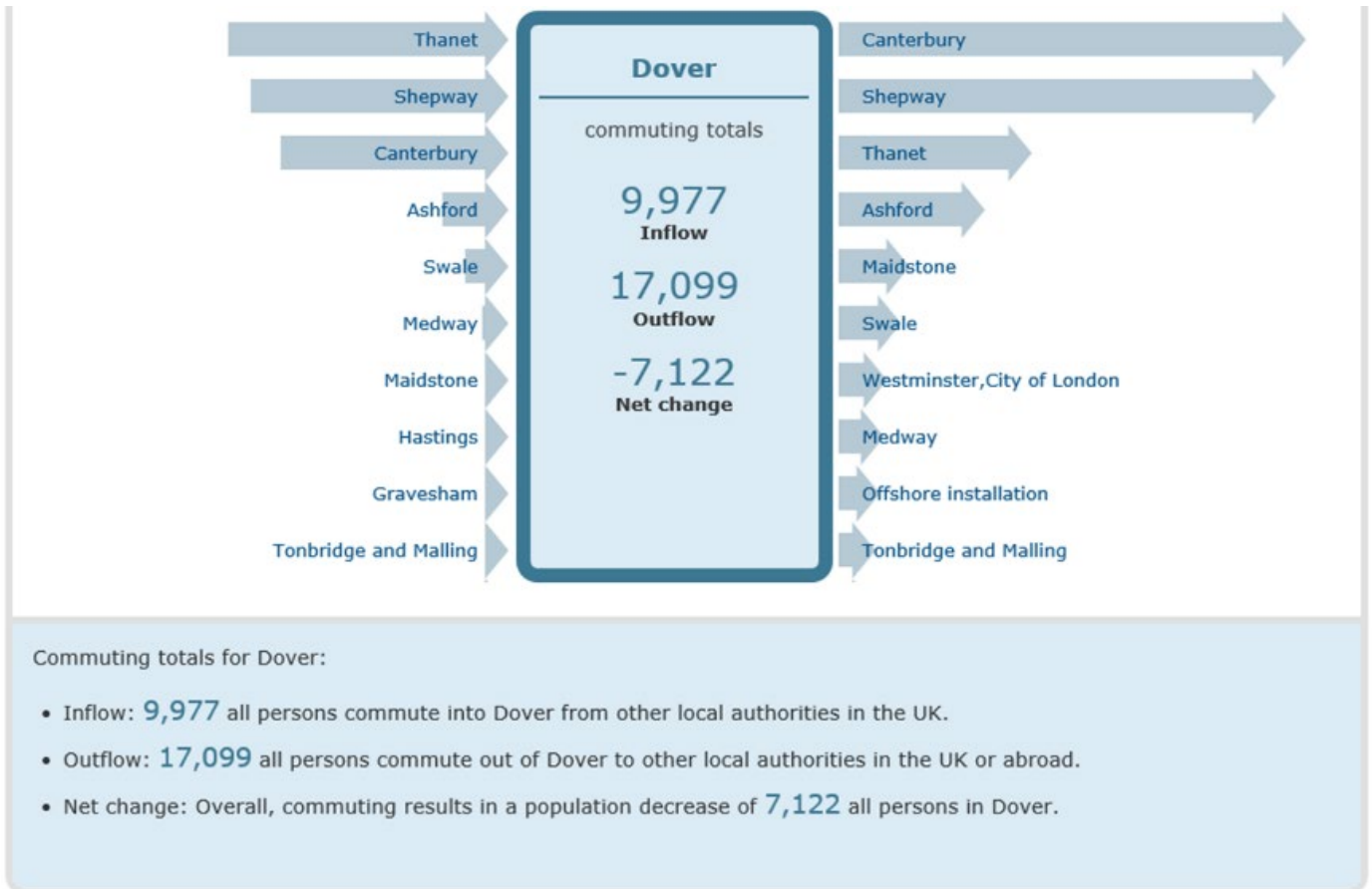
¹²⁵ Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

¹²⁶ Kent County Council (2011) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf

¹²⁷ Dover District Council & Partners (2007) Dover Transport Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>

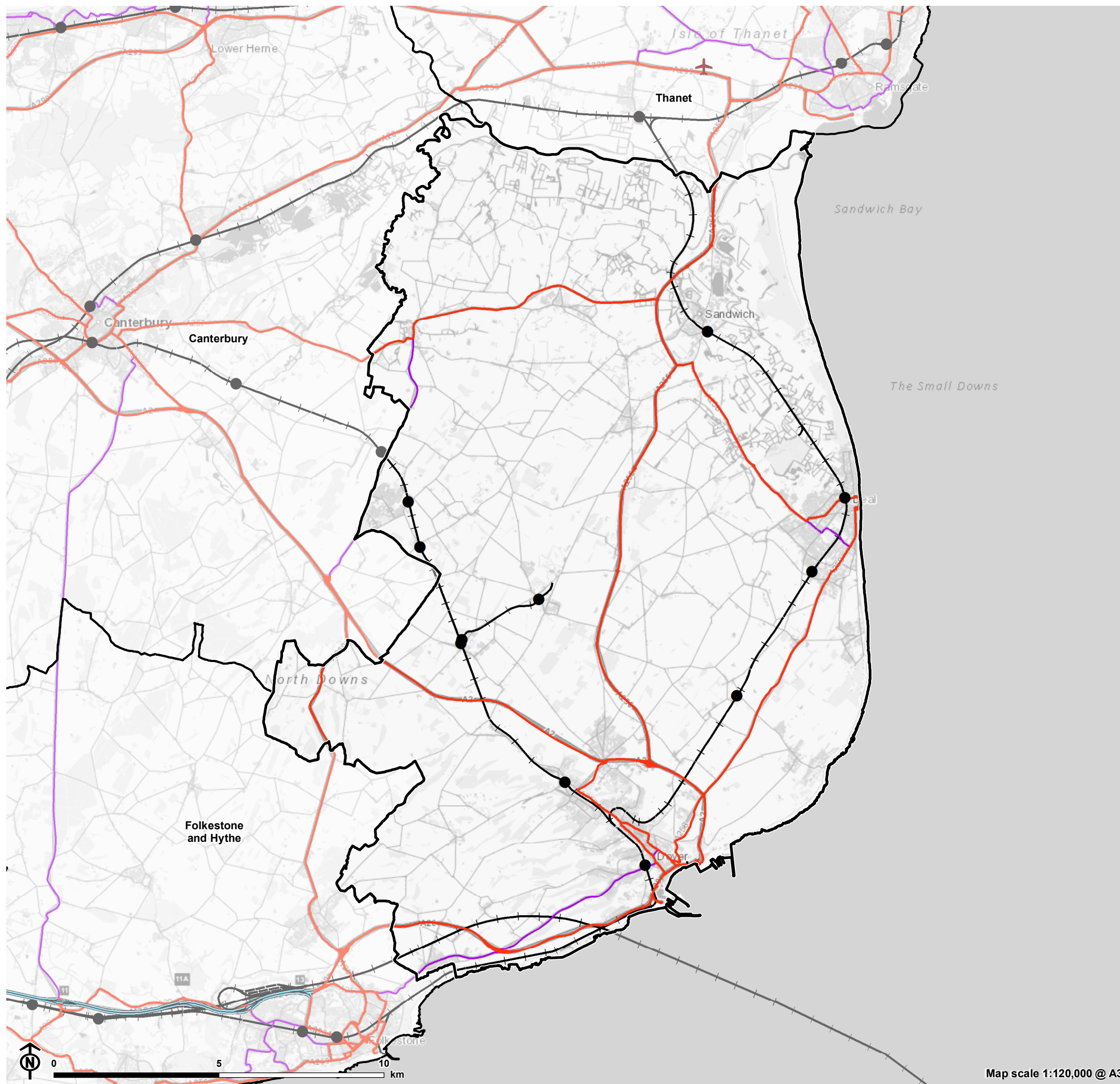
¹²⁸ Kent Highway Services (2008) Dover District Cycling Plan [online] Available at: https://www.kent.gov.uk/__data/assets/pdf_file/0005/7862/Dover-cycling-strategy.pdf

Figure B3: Location of usual residence and place of work in Dover¹²⁹



¹²⁹ NOMIS (2011) Location of usual residence and place of work [online]
Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>.

Figure B.4: Transport Links Across the District



Sustainability issues and likely evolution without the Local Plan

B.100 Key sustainability issues facing Dover are as follows:

- Port-related congestion along the M20/A20, M2/A2 and A21 is resulting in seasonal 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.101 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.3: Transport connections and travel habits SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	<p>SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complementary 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 related to Port activity?</p>	Air, Climatic Factors, Population and Human Health

Air, land and water quality

Policy context

International

B.102 United Nations Convention on the Law of the Sea (1982): International legal framework for all ocean activities, including conservation and resource management.

B.103 European Nitrates Directive (1991): Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

B.104 European Urban Waste Water Directive (1991): Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

B.105 European Air Quality Framework Directive (1996) and **Air Quality Directive** (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to

human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

B.106 European Drinking Water Directive (1998): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

B.107 European Landfill Directive (1999): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

B.108 European Water Framework Directive (2000): Protects inland surface waters, transitional waters, coastal waters and groundwater.

B.109 European Waste Framework Directive (2008): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

B.110 European Industrial Emission Directive (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed 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 taken as a whole.

National

B.111 National Planning Policy Framework (NPPF)¹³⁰: 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.112 National Planning Practice Guidance (NPPG)¹³¹: 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.113 Waste management plan for England¹³²: 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.114 National Planning Policy for Waste (NPPW)¹³³: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- 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.115 Safeguarding our Soils – A Strategy for England¹³⁴: 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.116 Water White Paper¹³⁵: 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.

¹³⁰ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹³¹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

¹³² Department for Environment, Food and Rural Affairs (2013) Waste management plan for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

¹³³ Department for Communities and Local Government (2014) National Planning Policy for Waste [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹³⁴ Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf

¹³⁵ Department for Environment, Food and Rural Affairs (2012) The Water White Paper [online] Available at: <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>

B.117 Water for Life White Paper¹³⁶: 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.118 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland¹³⁷: 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.

B.119 Future Water: The Government's water strategy for England¹³⁸: 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.120 A Green Future: Our 25 Year Plan to Improve the Environment¹³⁹: 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.121 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations¹⁴⁰: Sets out the Government's ambition and

¹³⁶ Department for Environment, Food and Rural Affairs (2011) Water for life [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf

¹³⁷ Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

¹³⁸ HM Government (2008) Future Water: The Government's water strategy for England [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf

¹³⁹ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

¹⁴⁰ Department for Environment Food and Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations [online] Available at:

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.122 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.123 Clean Air Strategy 2019¹⁴¹: 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.124 Department for Transport, The Road to Zero (2018)¹⁴²: 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.

Sub-national

B.125 Kent Environment Strategy¹⁴³ 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.126 Kent and Medway Growth and Infrastructure Framework (GIF)¹⁴⁴: 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.127 Kent Minerals and Waste Local Plan 2013-30¹⁴⁵: 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.

Local

B.128 Dover Air Quality Action Plan¹⁴⁶: 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 (NO₂). 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

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

¹⁴¹ DEFRA (2019) Clean Air Strategy 2019:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf.

¹⁴² Department for Transport (2018) The Road to Zero:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf.

¹⁴³ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

¹⁴⁴ Kent County Council (2015) Kent and Medway Growth and Infrastructure Framework [online] Available at:

https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf

¹⁴⁵ Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30 [online] Available at:

[file:///C:/Users/Temple_S/Downloads/Kent%20MWLP%20Adopted%20July%202016%20\(3\).pdf](file:///C:/Users/Temple_S/Downloads/Kent%20MWLP%20Adopted%20July%202016%20(3).pdf)

¹⁴⁶ Dover District Council (2020) Dover Air Quality Annual Status Report [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Home.aspx>

- Transfer of freight from road to rail.

B.129 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.130 The Kent Environment Strategy¹⁴⁷ 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.131 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 NO₂, 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).

NO₂

B.132 For NO₂ 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 identified¹⁴⁸.

B.133 There was one exceedance of the NO₂ 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.134 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.135 Figure B5 illustrates the location of the air quality management areas in the District.

B.136 An updated Air Quality Study assessing the likely implications of the Draft 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.

¹⁴⁷ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

¹⁴⁸ Bureau Veritas (2012) Air Quality Assessment in the Dover Area [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Air-Quality-Assessment-v4.pdf>

Land quality

Agricultural land quality

B.137 A large proportion of Dover District is agricultural land, which is mainly used for arable farming¹⁴⁹.

B.138 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 District¹⁵⁰. **Figure B6** illustrates the agricultural land classifications across the District.

Soils and minerals

B.139 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 District¹⁵¹.

B.140 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 soil¹⁵².

B.141 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 site¹⁵³.

B.142 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.143 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.144 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-abtracted.

B.145 The Kent Environment Strategy¹⁵⁴ 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 2031¹⁵⁵.

B.146 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.¹⁵⁶ 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

¹⁴⁹ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁵⁰ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁵¹ Jacobs Babbie (2006) Dover District Landscape Character Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>

¹⁵² Jacobs Babbie (2006) Dover District Landscape Character Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>

¹⁵³ Jacobs Babbie (2006) Dover District Landscape Character Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>

¹⁵⁴ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

¹⁵⁵ Aecom (2017) Kent Water for Sustainable Growth Study

¹⁵⁶ Dover District Council (2020) Water Cycle Study

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 demand¹⁵⁷. 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 Stress¹⁵⁸.

B.147

Water quality

B.148 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.149 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.150 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.¹⁵⁹

B.151 Kent's Water for Sustainable Growth Study¹⁶⁰ 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' status¹⁶¹. 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.¹⁶²

B.152 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 in the process of obtaining hydrological advice to determine the significance of the hydrological connection between Dover District and Stodmarsh.

B.153 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.

¹⁵⁷ Aecom (2017) Kent Water for Sustainable Growth Study

¹⁵⁸ Water Stressed Areas: 2013 Classification, HM Government [online] Available at: <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

¹⁵⁹ Dover District Council (2020) Water Cycle Study

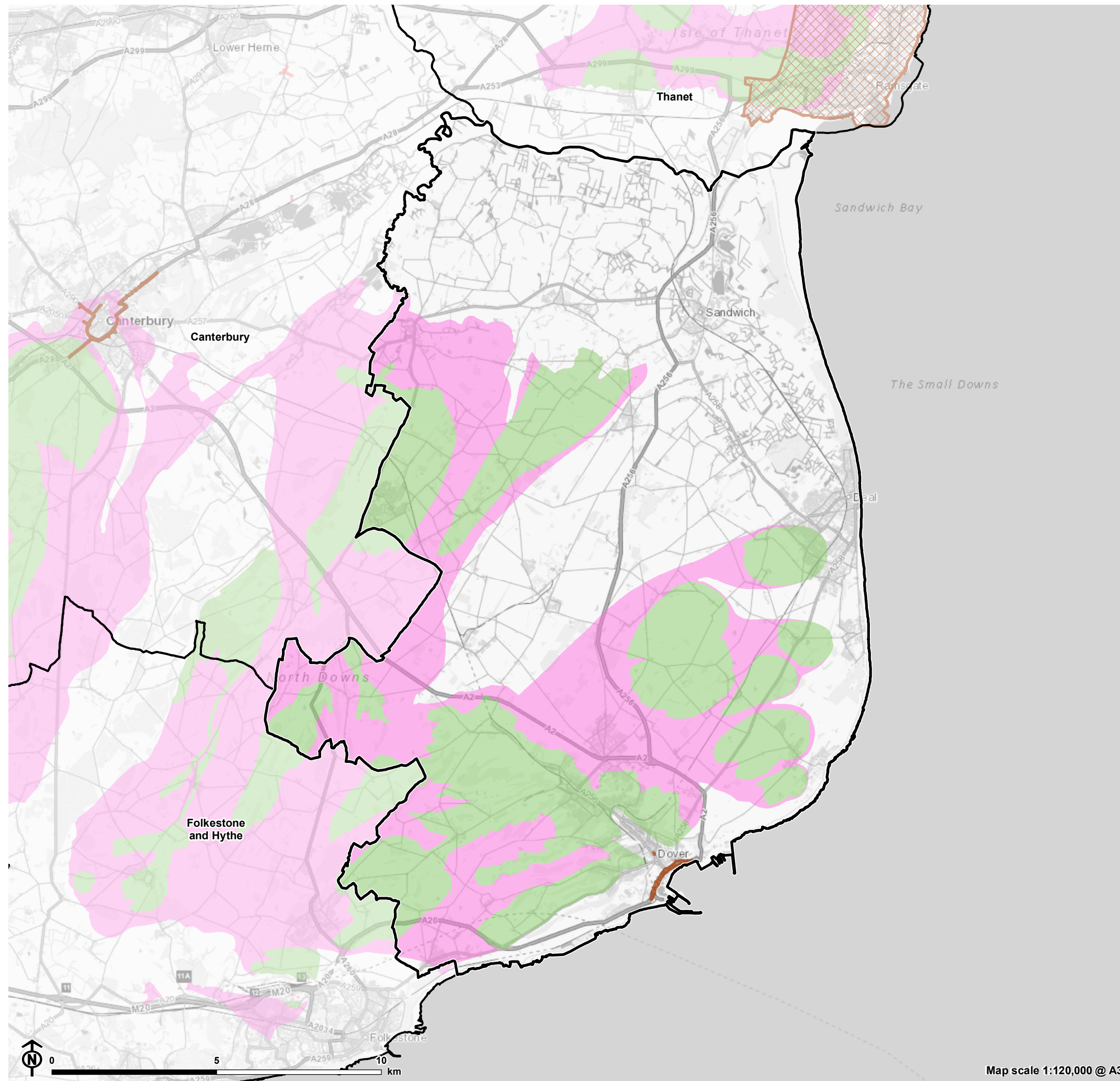
¹⁶⁰ Aecom (2017) Kent Water for Sustainable Growth Study [online] Available at: [file:///C:/Users/Buck_J/Downloads/Kent_water_for_sustainable_growth_2017%20\(1\).pdf](file:///C:/Users/Buck_J/Downloads/Kent_water_for_sustainable_growth_2017%20(1).pdf)

¹⁶¹ Environment Agency (2019) South East River Basin Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf

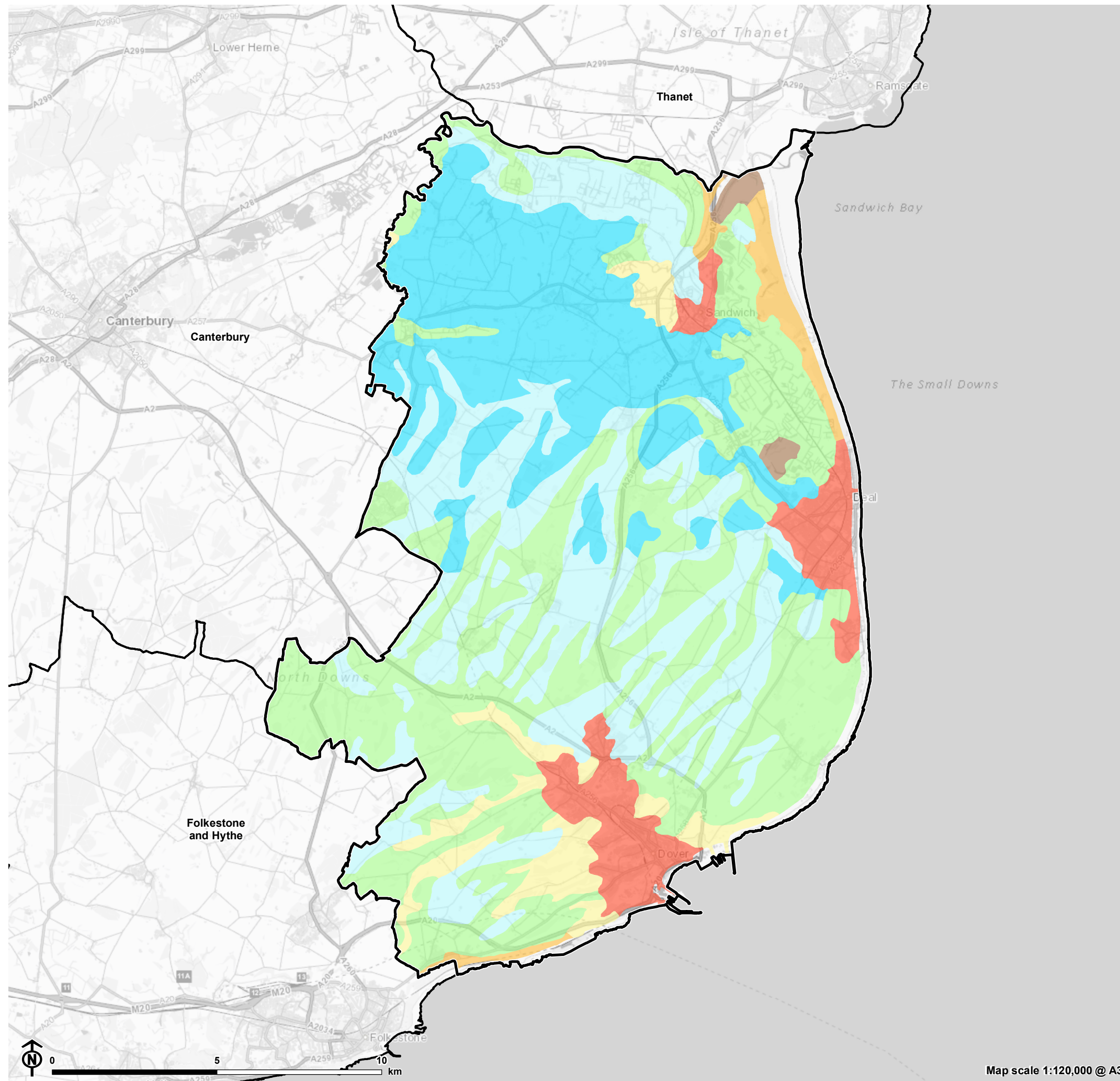
¹⁶² Aecom (2017) Kent Water for Sustainable Growth Study

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

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

Sustainability issues and likely evolution without the Local Plan

B.154 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).
- 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. 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.4: Air, land and water quality SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
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>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>SA 5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</p>	Soil, Water, Biodiversity, Human Health, Fauna and Flora and Landscape
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?	Air, Climatic Factors, and Human Health

Climate change adaptation and mitigation

Policy context

International

B.155 European Floods Directive (2007): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

B.156 European Energy Performance of Buildings Directive (2010): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

B.157 United Nations Paris Climate Change Agreement (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

B.158 National Planning Policy Framework (NPPF)¹⁶³ 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.159 National Planning Practice Guidance (NPPG)¹⁶⁴: 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.

B.160 Planning Act 2008¹⁶⁵: 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.161 Planning and Energy Act (2008)¹⁶⁶: 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.162 Climate Change Act 2008¹⁶⁷: 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.163 Flood and Water Management Act (2010)¹⁶⁸: 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.164 The UK Renewable Energy Strategy¹⁶⁹: 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.

¹⁶³ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁶⁴ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁶⁵ HM Government (2008) Planning and Energy Act 2008: <https://www.legislation.gov.uk/ukpga/2008/21>.

¹⁶⁶ HM Government (2008) Climate Change Act 2008: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf.

¹⁶⁷ HM Government (2008) Climate Change Act 2008 [online] Available at: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf

¹⁶⁸ HM Government (2010) Flood and Water Management Act 2010 [online] Available at:

http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf

¹⁶⁹ HM Government (2009) The UK Renewable Energy Strategy [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf

B.165 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK¹⁷⁰: 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.166 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate¹⁷¹: 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.167 UK Climate Change Risk Assessment 2017¹⁷²: 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 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.168 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England¹⁷³:

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.

7.15 A Green Future: Our 25 Year Plan to Improve the Environment¹⁷⁴: 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.

¹⁷⁰ Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf

¹⁷¹ HM Government (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf.

¹⁷² HM Government (2017) UK Climate Change Risk Assessment: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf.

¹⁷³ HM Government (2011) Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf

¹⁷⁴ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

7.16 The national flood and coastal erosion risk management strategy for England (2011)¹⁷⁵: 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.

7.17

Sub-national

7.18 Kent Environment Strategy¹⁷⁶ 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

7.19 Growing the Garden of England: A strategy for environment and economy in Kent¹⁷⁷: Seeks to ensure that a future sustainable community strategy helps to achieve a high quality Kent environment that is low carbon, resilient to climate change, and has a thriving green economy at its heart. The Strategy is organised into three themes and ten priorities:

- Living 'well' within our environmental limits – leading Kent towards consuming resources more efficiently, eliminating waste and maximising the opportunities from the green economy:
 - Make homes and public sector buildings in Kent energy and water efficient, and cut costs for residents and taxpayers.
 - Ensure new developments and infrastructure in Kent are affordable, low carbon and resource efficient.
 - Turn our waste into new resources and jobs for Kent.
 - Reduce the ecological footprint of what we consume.

- Rising to the climate change challenge – working towards a low carbon Kent prepared for and resilient to the impacts of climate change:
 - Reduce future carbon emissions.
 - Manage the impacts of climate change, in particular extreme weather events.
 - Support the development of green jobs and business in Kent.

7.20 Valuing our natural, historic and living environment – optimising the real economic and social benefits of high environmental quality while protecting and enhancing the unique natural and built-in character of Kent:

- Utilise the full social and economic potential of a high quality natural and historic environment in Kent.
- Conserve and enhance the quality of Kent's natural and heritage capital.
- Ensure that Kent residents have access to the benefits of Kent's coast, countryside, green space and cultural heritage.

7.21 River Stour Catchment Flood Management Plan¹⁷⁸:

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

¹⁷⁵ Environment Agency (2011) Understanding the risks, empowering communities, building resilience: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf.

¹⁷⁶ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf Kent Forum (2011)

¹⁷⁷ Growing the Garden of England: A strategy for environment and economy in Kent [online] Available at:

<https://shareweb.kent.gov.uk/Documents/environment-and-planning/environment-and-climate-change/the-kent-environment-strategy-and-progress-reports/kent-environment-strategy.pdf>

¹⁷⁸ Environment Agency (2009) River Stour Catchment Flood Management Plan [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293884/Stour_Catchment_Flood_Management_Plan.pdf

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.

Local

7.22 Dover Surface Water Management Plan¹⁷⁹: 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.169 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 present¹⁸⁰. 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 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.170 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

¹⁷⁹ Jacobs (2011) Dover Surface Water Management Plan [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Surface-Water-Management-Plan.pdf>

¹⁸⁰ UK Climate Projections (2018) Fact Sheet [online] Available at: <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-temperature.pdf>

approximately 64,000 properties at risk of river and coastal flooding, of which approximately 46,000 are residential¹⁸¹.

B.171 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 spring 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 risk¹⁸².

B.172 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 extent¹⁸³.

B.173 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.174 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 networks¹⁸⁴.

Tidal flooding

B.175 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)¹⁸⁵.

B.176 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)¹⁸⁶.

Surface water flooding

B.177 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 area¹⁸⁷.

B.178 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.179 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.180 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

¹⁸¹ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸² Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸³ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸⁴ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸⁵ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸⁶ Herrington Consulting Ltd (2019) Strategic Flood Risk Assessment [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>

¹⁸⁷ Herrington Consulting Ltd (2019) Site-specific Guidance for Managing Flood Risk [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Site-Specific-Guidance-for-Managing-Flood-Risk-March-2019.pdf>

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 Castle¹⁸⁸.

B.181 The District is in the process of updating its Strategic Flood Risk Assessment to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.

Climate change mitigation

B.182 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 security¹⁸⁹.

B.183 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%.

¹⁸⁸ Low Carbon Kent (2013) Climate Local Kent – One Year On: Progress Report 2013 [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0014/10670/Climate-Local-Kent-Report-2013.pdf

¹⁸⁹ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

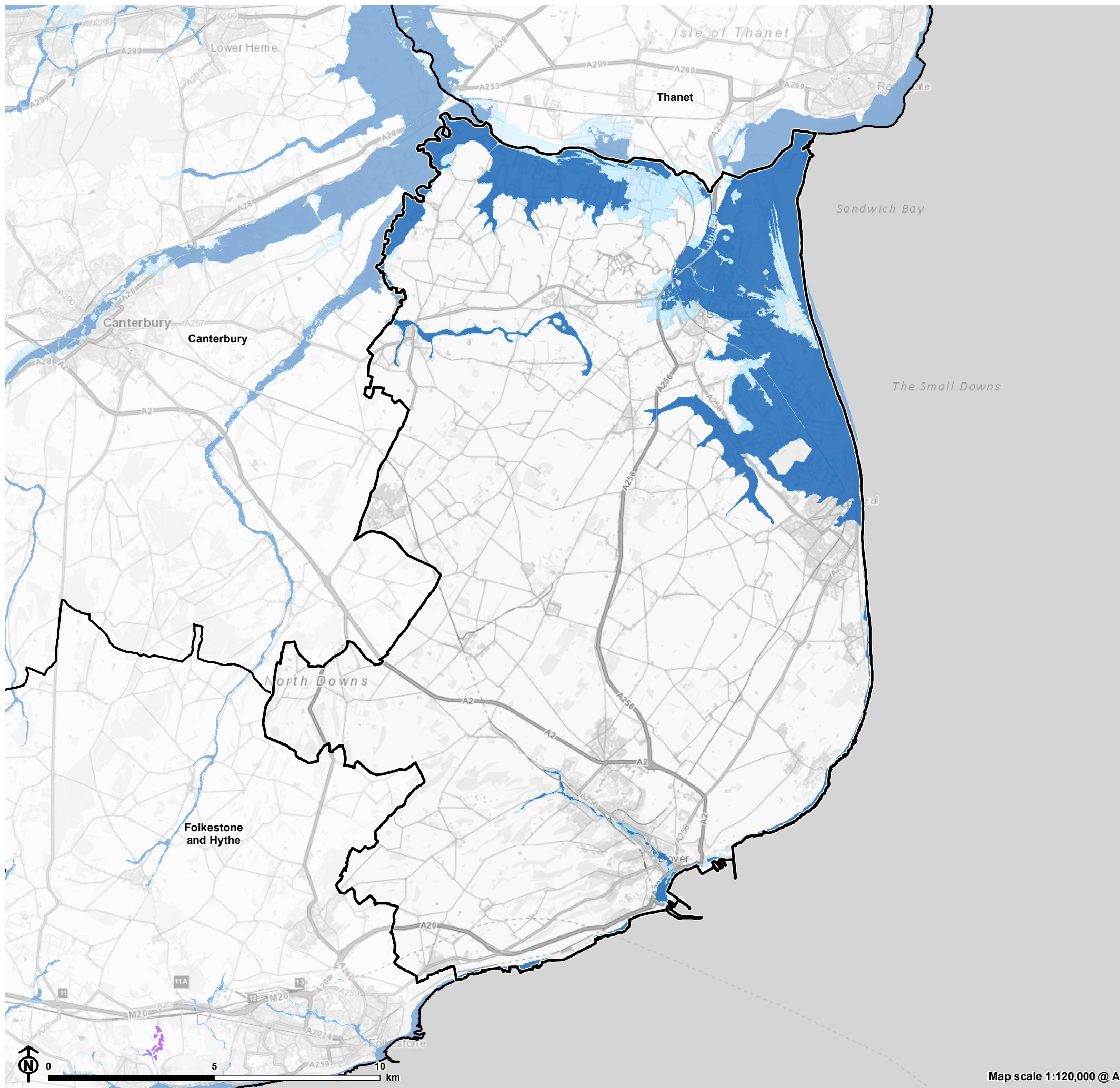







Figure B.7: Flood Risk

-  Neighbouring district boundary
-  District boundary
-  Flood storage area
-  Flood zone 2
-  Flood zone 3

Sustainability issues and likely evolution without the Local Plan

B.184 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 any coastal flooding and help the District's communities adapt to the increased likelihood of significant weather events in the future (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 (see SA objective 8).

SA objectives

Table B.5: Climate change and flood risk SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
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?	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 the use of electric cars and sustainable modes of transport.	Water, Soil, Climatic Factors and Human Health

Biodiversity

Policy context

International

B.185 International Convention on Wetlands (Ramsar Convention) (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.186 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.187 International Convention on Biological Diversity (1992): International commitment to biodiversity conservation through national strategies and action plans.

B.188 European Habitats Directive (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.189 European Birds Directive (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which

corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.190 United Nations Declaration on Forests (New York Declaration) (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

National

B.191 National Planning Policy Framework (NPPF)¹⁹⁰: 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.192 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.193 National Planning Practice Guidance (NPPG)¹⁹¹: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

B.194 Natural Environment and Rural Communities Act 2006¹⁹²: Places a duty on public bodies to conserve biodiversity.

B.195 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services¹⁹³: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological 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.196 Biodiversity offsetting in England Green Paper¹⁹⁴:

Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.197 A Green Future: Our 25 Year Plan to Improve the Environment¹⁹⁵: 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.

¹⁹⁰ Ministry of Housing, Communities & Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

¹⁹¹ Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>.

¹⁹² HM Government (2006) Natural Environment and Rural Communities Act 2006 [online] Available at: http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

¹⁹³ Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England’s wildlife and ecosystem services [online] Available

at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

¹⁹⁴ Department for Environment, Food and Rural Affairs (2013) Biodiversity offsetting in England Green Paper [online] Available at: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf

¹⁹⁵ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

Sub-national

B.198 Kent Environment Strategy¹⁹⁶ 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.199 Kent Biodiversity Action Plan¹⁹⁷: 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.200 Kent Nature Partnership Biodiversity Strategy (2018 – 2044)¹⁹⁸: 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.201 A Living Landscape for the South East¹⁹⁹: 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.
- 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.202 Green Infrastructure Strategy²⁰⁰: 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.203 Securing the value of nature in Kent²⁰¹: Explains the benefits of harnessing the value of nature to support business and economy, public health and productive and environmental management.

B.204 An East Kent Approach to Green Infrastructure and Recreation (2014)²⁰²: 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.

Current baseline

Biodiversity

B.205 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

¹⁹⁶ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

¹⁹⁷ Kent BAP (2011) Kent Biodiversity Action Plan [online] Available at: <http://www.kentbap.org.uk/>

¹⁹⁸ Kent Nature Partnership (2018-2044) Biodiversity Strategy [online] Available at: <https://democracy.kent.gov.uk/documents/s89509/Item%2014%20-%20Appendix%201%20-%20Kent%20Biodiversity%20Strategy%20Final%20Draft%20Feb%202019.pdf>

¹⁹⁹ The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf

²⁰⁰ Dover District Council (2014) Green Infrastructure Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>

²⁰¹ Pape, D and Johnston, J (2011) Securing the value of nature in Kent [online] Available at: http://www.kentbap.org.uk/images/uploads/Securing_the_Value_of_Nature_in_Kent.pdf

²⁰² Val Hyland Consulting and Blackwood Bayne Consulting. (2014) An East Kent Approach to Green Infrastructure and Recreation. [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/An-East-Kent-Approach-to-Green-Infrastructure-and-Recreation-Report-April-2014.pdf>

habitats and species in the county, for example of the Local Wildlife Sites monitored over the past five years, 30% have been damaged 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 provides²⁰³.

B.206 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.207 An ongoing visitor disturbance study²⁰⁴ 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 SPA Mitigation Strategy²⁰⁵ states that development in Dover may impact Sandwich Bay.

B.208 The Thanet Coast SPA Mitigation Strategy is to be updated in conjunction with the HRA during the drafting and assessment of the Proposed Submission Dover Local Plan. Monitoring and visitor surveys are currently being undertaken to inform this work.

B.209 Stodmarsh SPA, RAMSAR and SAC is located close to the north western edge of the District in neighbouring Canterbury. Stodmarsh is sensitive to increases in phosphorous and nitrogen reducing water quality. Developments in the immediate vicinity of the marsh are being sought to achieve nutrient neutrality.

B.210 The findings of the HRA will be taken into account in the SA where relevant.

B.211 There are five SSSIs in the District:

- Alkham, Lydden and Swingfield Woods (76.56% favourable condition).
- 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.212 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.213 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

²⁰³ Kent County Council (2016) Kent Environment Strategy [online] Available at: http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf

²⁰⁴ Strategic Marketing (2012) Dover Visitor Survey: Pegwell Bay and Sandwich Bay [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Visitor-Survey-Pegwell-Bay-and-Sandwich-Bay-2012.pdf>

²⁰⁵ Dover District Council (2012) Thanet Coast SPA Mitigation Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Thanet-Coast-SPA-Mitigation-Strategy.pdf>

cordaites and charcoal. Fossil animals found include arthropods both terrestrial and freshwater.

-  District boundary
-  Neighbouring district boundary
-  Special Protection Area
-  Special Area of Conservation
-  Ramsar
-  Site of Special Scientific Interest
-  National Nature Reserve
-  Local Nature Reserve
-  Regionally Important Geological Site



Sustainability issues and likely evolution without the Local Plan

B.214 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.6: Biodiversity SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA 9: To conserve, connect and enhance the District's wildlife habitats and species.	<p>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?</p> <p>SA 9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</p> <p>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?</p> <p>SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?</p>	Biodiversity, Flora and Fauna and Landscape.

Historic environment

Policy context

International

B.215 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.216 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.217 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)²⁰⁶: 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.218 National Planning Policy Framework (NPPF)²⁰⁷: 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:

- the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

²⁰⁶ Council of Europe (1992) Valletta Treaty [online] Available at: <https://rm.coe.int/168007bd25>

²⁰⁷ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- 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.219 National Planning Practice Guidance (NPPG)²⁰⁸:

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.220 Ancient Monuments & Archaeological Areas Act 1979²⁰⁹:

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.221 Planning (Listed Buildings & Conservation Areas) Act 1990²¹⁰:

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.

B.222 The Government’s Statement on the Historic Environment for England 2010²¹¹:

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.223 The Heritage Statement 2017²¹²: 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.224 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8²¹³: Sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Sub-national

B.225 The Kent Design Guide²¹⁴: 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.226 Lighting the way to success: The EKLSP

Sustainable Community Strategy²¹⁵: 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

²⁰⁸ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance:

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

²⁰⁹ HM Government (1979) Ancient Monuments & Archaeological Areas Act:<https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>.

²¹⁰ HM Government (2002) Planning (Listed Buildings & Conservation Areas) Act (1990):

http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf.

²¹¹ HM Government (2010) The Government’s Statement on the Historic Environment for England 2010 [online] Available at: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>

²¹² Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017__final_-_web_version_.pdf

²¹³ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 [online] Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf>

²¹⁴ Kent Design Initiative (2008) The Kent Design Guide [online] Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0014/12092/design-guide-foreword.pdf

²¹⁵ East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLSP Sustainable Community Strategy [online] Available at: [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)

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.227 The Kent Environment Strategy (2016): 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. 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.228 Dover District Heritage Strategy²¹⁶: 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.229 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.230 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.231 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.232 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 people²¹⁷. Further information on the non-designated (and designated) heritage assets in Dover can be found on Kent County Council's Historic Environment Record.

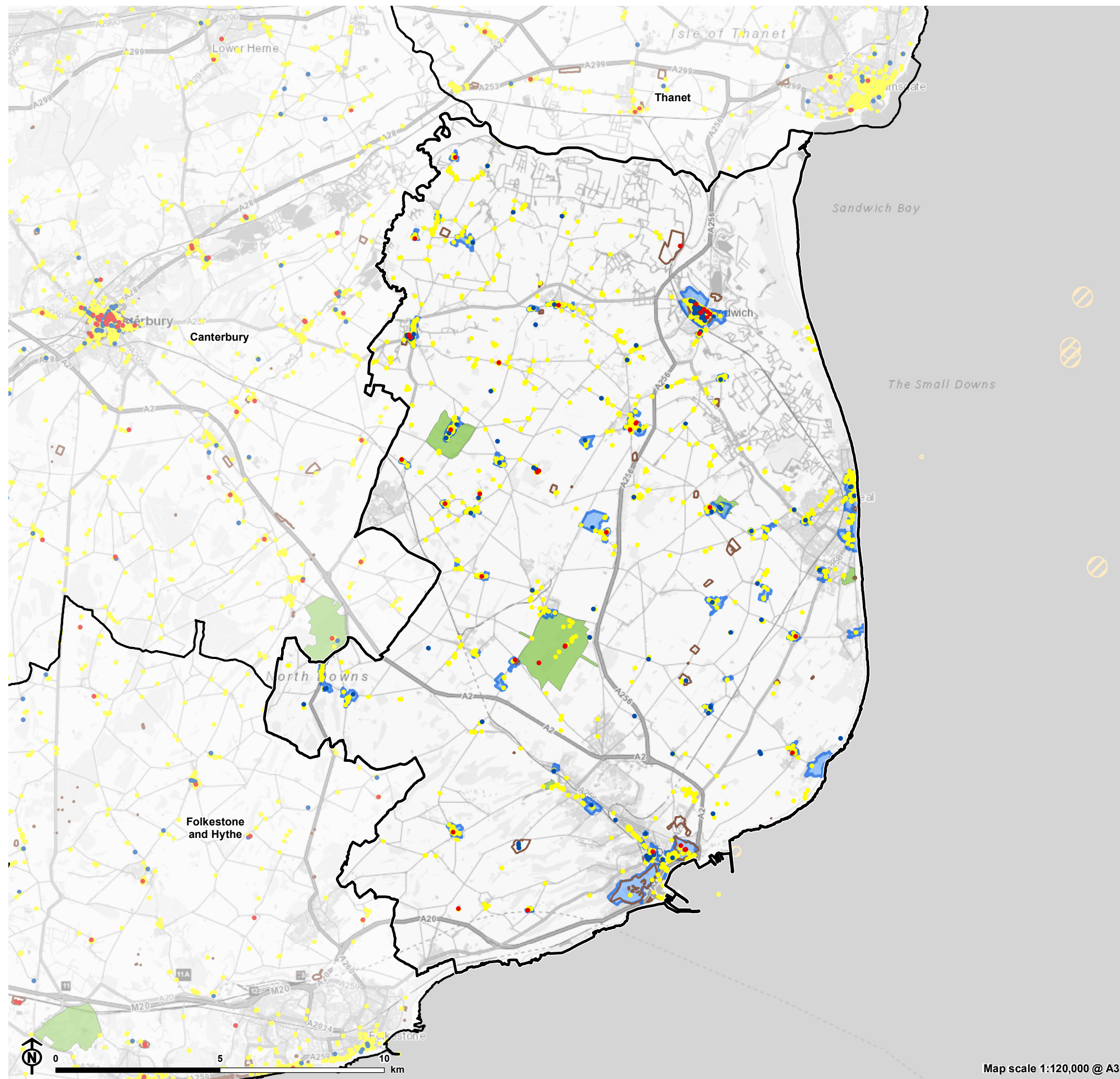
B.233 The Historic England at Risk Register lists 13 assets at risk, five of which are in 'Very bad' condition (London Road,

²¹⁶ Dover District Council (2013) Dover District Heritage Strategy [online] Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Heritage-Strategy-Main-Document.pdf>

²¹⁷ Dover District Council (2020) Dover District Heritage Strategy 2020 [online] Available at: <https://www.dover.gov.uk/Planning/Regeneration/PDF/Heritage-Strategy-main-doc-web-PDF.pdf>

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.

Figure B.9: Historic Environment



Sustainability issues and likely evolution without the Local Plan

B.234 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.7: Historic environment SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
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>	Cultural Heritage

Landscape

Policy context

International

B.235 European Landscape Convention (2002): 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.236 National Planning Policy Framework (NPPF)²¹⁸: 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.237 National Planning Practice Guidance (PPG)²¹⁹:

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.238 A Green Future: Our 25 Year Plan to Improve the Environment²²⁰: 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:

²¹⁸ Ministry of Housing, Communities and Local Government (last updated 19 June 2019) National Planning Policy Framework: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf.

²¹⁹ Ministry of Housing, Communities & Local Government (last updated 1 October 2019) Planning Practice Guidance: <https://www.gov.uk/government/collections/planning-practice-guidance>

²²⁰ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

- 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.

Sub-national

B.239 Kent Downs Area of Outstanding Natural Beauty:

Management Plan 2014-2019²²¹: Sets out measures to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised maintained and strengthened well into the future. The Kent Downs AONB unit is in the process of updating the management plan.

B.240 Lighting the way to success: The EKLSP

Sustainable Community Strategy²²²: 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.

Current baseline

Geology and soils

B.241 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.242 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.243 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.244 The low-lying shingle beaches along the coast are backed by sand dunes but rise to chalk cliffs to the south of Deal.

B.245 West of Sandwich the landform is characterised by the flat to gently undulating landscapes of the fertile horticultural belt.

B.246 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.247 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.248 Land use within the District reflects the topography and soil types.

B.249 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.250 The coastal land to the east of the District, although rich in biodiversity, is of little value for agriculture.

B.251 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.252 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.

²²¹ Kent Downs AONB Unit (2014) Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019 [online] Available at: http://www.kentdowns.org.uk/uploads/documents/1_The_Kent_Downs_AONB.pdf

²²² East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLSP Sustainable Community Strategy [online] Available at:

[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_the_Way_to_Success_The_EKLSP_Sustainable_Community_Strategy_(Document_Ref_A85).pdf)

B.253 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.254 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.

- Chalk Hills:
 - Lydden Hills
 - Guston Hills
- Defensive Hills:
 - Richborough Bluff

Landscape designations






B.255 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.

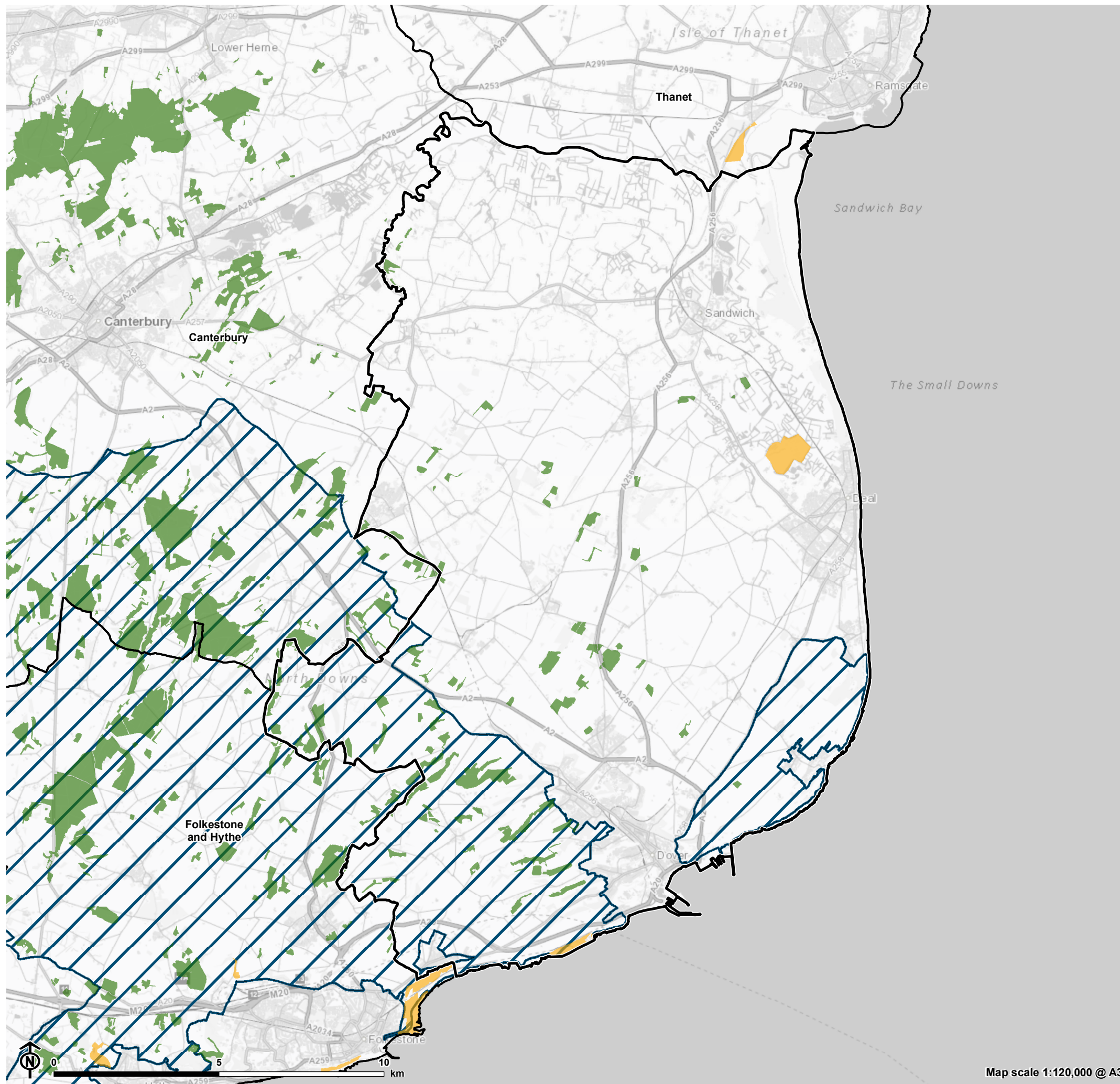
Landscape character types and areas

B.256 The District is comprised of the following landscape character types and areas²²³:

- 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

²²³ LUC, Dover District Landscape Character Assessment (2020) [online]
Available at: <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Heritage.aspx>

-  District boundary
-  Neighbouring district boundary
-  Area of Outstanding Natural Beauty
-  Country park
-  Ancient woodland



Sustainability issues and likely evolution without the Local Plan

B.257 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

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	SA 11.1: Does the Plan protect the District's sensitive and special landscapes, seascapes and townscapes? 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?	Landscape, Cultural Heritage, Biodiversity, Flora and Fauna

Appendix C

SA of growth and spatial options 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: Adopt- ed 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 effects likely			++/-- Mixed significant effects likely		

Spatial Option A (suitable sites)**Growth Option 1 (lowest growth)**

C.1 Spatial Option A (suitable sites) would focus the highest proportion of housing development (approximately 76% towards the Dover town with the remainder mostly being delivered at sites in and around the District's smaller, generally more rural, settlements. Through the lowest growth scenario (Growth Option 1) only very modest levels of development would be provided at Deal and Sandwich, with almost no development occurring at Aylesham. This option would be significantly less likely to address affordability in the settlements of Sandwich and Deal which are most affected by these issues. It would also be less likely to address issues of access to housing in Aylesham. Overall a mixed significant positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth)

C.2 The same effect is recorded for Growth Option 2 (medium growth) as Growth Option 1 (lowest growth) which delivers the same scale of housing growth.

Growth Option 3 (highest growth)

C.3 Growth Option 3 could result in the strengthening of the significant positive effect recorded in relation to SA objective 1 by increasing the overall level of housing provided in the plan

area to 12,111 dwellings. This increase is likely to be supportive to the provision of affordable housing. The overall increase in housing delivery would, however, not lead to a substantial increase in the level of housing to be provided at Deal or Sandwich. Through Growth Option 3 Aylesham would accommodate a significantly larger amount of housing development which could address issues of access to housing at this settlement. Overall a mixed significant positive and minor negative effect is expected in relation to SA objective 1.

Spatial Option B (population based)**Growth Option 1 (lowest growth)**

C.4 Spatial Option B (population based) would provide a high level of growth to the larger settlements of the plan area given their larger existing populations. Even through the low growth scenario (Growth Option 1) this could help to address barriers to housing noted to be present in the larger settlements of District.

C.5 This option would, however, respond less positively to housing affordability in Sandwich in particular considering that the number of homes to be provided at this location would be substantially reduced compared to other options. As the approach to development through this option would be to allow for proportionate growth across the majority of settlements some growth would occur at rural settlements to address housing needs at these locations. A mixed significant positive and minor negative effect is therefore expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.6 The same effect is recorded for Growth Option 2 (medium growth) as Growth Option 1 (lowest growth) which delivers the same scale of housing growth.

Growth Option 3 (highest growth)

C.7 Growth Option 3 could result in strengthening of the significant positive effect recorded in relation to SA objective 1 by increasing the overall level of housing provided in the plan area to 12,111 dwellings. Higher levels of affordable housing might be provided through this approach. This is likely to strengthen the significant positive effect recorded in relation to SA objective 1. Through a proportionate approach to the distribution of growth in the plan area, Growth Option 3 would not result in a substantial increase in the level of housing development at any one settlement in Dover District, which might otherwise address specific issues of affordability. Therefore, no change is expected in relation to the potential to address issues of affordability or accessibility to housing at the settlements. Overall a mixed significant positive and minor negative effect in relation to SA objective 1.

Spatial Option C (settlement hierarchy)**Growth Option 1 (lowest growth)**

C.8 Providing housing growth in a manner which follows the existing settlement hierarchy through Spatial Option C would help to address affordability issues in Sandwich and Aylesham more effectively than Spatial Option B (population), but considerably fewer homes would be distributed amongst the District's rural settlements, resulting in there still being the potential for affordability issues in certain parts of the District. Therefore, a mixed significant positive and minor negative effect is also expected for Option C (settlement hierarchy) for the lowest growth scenario (Growth Option 1).

Growth Option 2 (medium growth)

C.9 The same effect is recorded for Growth Option 2 (medium growth) as Growth Option 1 (lowest growth) which delivers the same scale of housing growth.

Growth Option 3 (highest growth)

C.10 Growth Option 3 would increase the level of overall housing development which could have increased benefits in terms of numbers of affordable dwellings overall across the District; however the distribution of these homes under Spatial Option C (settlement hierarchy) would still have the potential to maintain affordability issues in the District's rural areas.

Therefore, no change is expected in relation to the potential to address issues of affordability or accessibility to housing at the settlements for this option. Overall a mixed significant positive and minor negative effect in relation to SA objective 1.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.11 Spatial Option D focusses housing growth mostly at Dover town with the remainder distributed relatively evenly amongst Deal, Sandwich, Aylesham and the higher tier rural settlements is expected to only address issues of access to housing in Dover town, and to a lesser extent at Sandwich and Deal. This option would place a heavy reliance on housing delivery at the Whitfield, which has historically seen slow rates of delivery. Therefore, this option could present issues with meeting local housing needs over the Plan period.

C.12 Growth amongst the more rural settlements would continue to only be delivered at the larger villages, although some settlements located relatively high in the District's settlement hierarchy (most notably the local centre of Wingham) would accommodate no development. Therefore the low growth scenario (Growth Option 1) records a mixed significant positive and significant negative effect for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.13 The same effect is recorded for Growth Option 2 (medium growth) as Growth Option 1 (lowest growth) which delivers the same scale of housing growth.

Growth Option 3 (highest growth)

C.14 While Growth Option 3 would not result in a different distribution of housing growth in the plan area, it would allow for more substantial housing delivery at Sandwich and Deal (around 600 homes and 1,200 homes respectively) which could better help to address affordability issues at these settlements. The higher level of overall housing development across the District could result in increased levels of affordable housing being delivered. This spatial option would, however, still place heavy reliance on housing delivery at the Whitfield, which has historically experienced slow rates of delivery. Overall a mixed significant positive and minor negative effect is expected in relation to SA objective 1 for this option.

Spatial option E (more even settlement focus)**Growth Option 1 (lowest growth)**

C.15 Spatial Option E would allow for the lowest level of development at the Dover area. This option would therefore likely be less effective in terms of addressing issues of access to housing in the District's largest settlement. Issues of affordability in the most unaffordable areas of the District (Sandwich and Deal) are, however, likely to be positively impacted upon through this option even if the low growth scenario (Growth Option 1) was taken forward. This option includes the highest amount of growth where delivery rates have been stronger in recent years in the District which could help ensure faster completion rates. A mixed significant positive and minor negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.16 The same effect is recorded for Growth Option 2 (medium growth) as Growth Option 1 (lowest growth) which delivers the same scale of housing growth.

Growth Option 3 (highest growth)

C.17 Growth Option 3 would greatly increase the overall number of homes to be delivered in the plan area with potential for significant positive effect expected in relation to SA objective 1 to be strengthened. Increased housing development could have general benefits in terms of addressing affordability and could also lead to the delivery of higher numbers of affordable homes. Through the higher level of overall development, the level of housing to be provided in and around Dover town would be increased to approximately 2,420 dwellings. The additional number of homes could go some way to help address issues of access to homes in the largest settlement. However, it would not re-apportion housing growth to be more considerate of the large size of this settlement. Overall a mixed significant positive and significant negative effect is expected in relation to SA objective 1 for this option.

SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, 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: Adopt- ed 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 effects likely	++/-- Mixed significant effects likely		--/+ Mixed significant negative and minor positive effects likely		

Spatial option A (suitable sites)**Growth Option 1 (lowest growth)**

C.18 Spatial Option A would focus the highest proportion of overall housing development in and around Dover town (approximately 76%) and the rural villages (approximately 17%). Even through the low growth scenario (Growth Option 1) this option would result in many new residents having a good level of access to widest range of services and facilities

in and around Dover town, although this could result in some overburdening of existing services dependent upon the delivery of new infrastructure, services and facilities within developments. This element of the overall housing development could also increase potential impacts relating to air quality, noise pollution and health considering the potential for Dover's congestion issues along the M20/A20/A2 to be exacerbated. Where development in and around Dover town can be provided to avoid overburdening existing services and facilities, more residents may also be encouraged to use more

active modes of transport considering the short journey time to these types of provisions. Access is also provided in Dover town to two railway stations, including the High Speed 1 railway route to London.

C.19 By limiting development at the other larger settlements in the plan area (particularly Deal and Sandwich) Spatial Option A (suitable sites) would fail to make use of many of the centres which provide access to highest numbers of services and facilities, which could have adverse impacts in terms of town centre viability in certain settlements. The focus of relatively high level (approximately 17% of the overall housing growth) of housing development at rural locations could help to support rural service provision at those settlements identified for growth. The level of housing development at each rural settlement is less likely to support significant new service provision, however, meaning that this option would require a large number of new residents to travel longer distances to access some essential services. Overall a mixed significant positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth)

C.20 Growth Option 2 would provide additional employment land in the plan area coming forward on suitable and potentially suitable sites identified through the District's ELR. The EDNA (2017) has indicated that there is no need for the allocation of additional employment land beyond existing commitments over the Plan period. However, the UK economy is in a period of significant change and uncertainty, which may require local changes to the range and scale of local employment opportunities in the short, medium and long term. More employment land in sustainable locations could help to address issues of deprivation and could also support the uptake of active travel in the plan area to benefit public health. 68% of the additional employment land opportunities are in around Dover town where deprivation is particularly prevalent. However, concentrating so much housing and employment growth in Dover town is likely to exacerbate the settlement's existing air and noise pollution issues, particularly along the M20/A20/A2. An overall mixed significant positive and significant negative effect is therefore expected for the medium growth scenario.

Growth Option 3 (highest growth)

C.21 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111 by allocating all suitable and potentially suitable sites identified through the District's HELLA. It would also deliver the additional employment land on the suitable and potentially suitable sites identified through the District's ELR. Through this option around 6,800 homes would be provided in and around Dover

town. Again, this could have impacts in terms of addressing deprivation in the settlement, but the highest level of growth could also have impacts in terms of the capacity of services, dependent upon the phasing of new development, and the exacerbation of Dover's known air and noise pollution issues.

C.22 The allocation of the potentially suitable HELAA sites, under Growth Option 3 would see a relatively large increase in the number of homes being delivered at Aylesham and the rural settlements. This element of growth could support new service provision and also help to address issues of deprivation at Aylesham, as well as wider pockets of rural deprivation in the Plan area. However, the more rural residents are still likely to need to travel regularly to access some services. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.23 Spatial Option B would result in significant growth in and around Dover town (approximately 39%) and Deal (approximately 28%), due to the relatively large population sizes. The proportion of development to be provided in and around Dover town through this option would be reduced compared to other options considered and this option would also provide higher proportion of development (approximately 25% in total) at more rural settlements.

C.24 Such significant growth in rural areas and the smaller towns, will increase the need for new residents to travel access to existing services and facilities, although it may provide opportunities to address rural deprivation in the plan area as new development is delivered. Limited growth to the suitable housing sites identified in the District's HELAA (through Growth Option 1) will result in a particularly disparate distribution of the required growth, which is unlikely to support substantial new service provision, given that certain development thresholds will need to be reached to provide certain facilities such as secondary schools. Furthermore, delivering lower levels of growth in and around Dover town would be less likely to address deprivation at this location.

C.25 This option would help to limit development (and resultant higher levels of traffic) within or near to the AQMAs within Dover town, but a more even distribution of growth across the District could lead to increased private car use as residents need to travel longer distances to access services and facilities. This is likely to have adverse effects on air quality as well through limiting the potential uptake of active modes of transport to the detriment of public health. Overall, a mixed minor positive and significant negative effect is expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.26 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. More employment land in sustainable locations could help to address issues of deprivation and could also support the uptake of active travel in the plan area to benefit public health. This option would result in a substantial uplift in the employment land in and around Dover town where deprivation is particularly prevalent. However, concentrating so much housing and employment growth in Dover town is likely to exacerbate the settlement's existing air and noise pollution issues, particularly along the M20/A20/A2. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.27 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. While the lower levels of housing set out through Growth Options 1 and 2 would be less likely to exacerbate congestion within Dover town and air quality and noise issues at this location, Growth Option 3 would result in a relatively large increase in the number of homes as well as the employment land at this location. The higher development could therefore result in particular issues relating to local air quality and noise. The higher levels of development supported at a range of rural settlements would better support rural service provision, with settlements Ash, Capel-le-Ferne, Eastry and St Margaret's all accommodating more than 200 homes. Although residents at these locations are still likely to need to travel regularly to access some services. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option C (settlement hierarchy)**Growth Option 1 (lowest growth)**

C.28 Spatial Option C concentrates growth further up the District's settlement hierarchy where there is greater accessibility to services and facilities. This option would therefore provide most of the new development over the Plan period (approximately 45%) in Dover town where service provision is strongest, with more limited but still sizeable levels of development at the larger settlements of Deal, Sandwich and Aylesham.

C.29 This approach would give the majority of residents good access to services and facilities and maintain several different services centres. The close proximity of these provisions could encourage use of active transport in the District. The high level

of development provided in and around Dover town could result in the settlement's existing air quality and noise issues being intensified. Overall, a mixed significant positive and minor negative effect is expected for Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth)

C.30 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment opportunities could help to address issues of deprivation and could also support the uptake of active travel in the plan area to benefit public health. This option would result in a higher level of employment land being delivered in and around Dover town compared with Spatial Option B (population based) but would be slightly lower than some of the other spatial options considered. Through this medium development scenario, a high number of residents having access to a wide range of services and facilities at the larger settlements. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.31 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. The lower levels of housing set out through Growth Options 1 and 2 would be less likely to exacerbate congestion within in Dover town and air quality issues at this location, however, Growth Option 3 would result in a relatively large increase in the number of homes as well as the employment land at this location. The greater scale of development could therefore result in particular issues relating to local air quality. Through this higher growth scenario the level of housing development at the more rural settlements would also be increased. No settlement would accommodate more than 100 new houses and therefore this element of the option could maintain the viability of local services and facilities without resulting in substantial overburdening. This growth is however unlikely to support substantial new service provision at these locations, so residents from rural locations are likely to have to travel longer distances to access some services and facilities. An overall mixed significant positive and minor negative effect is therefore expected for the level of medium growth.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.32 Focussing a substantial proportion (approximately 70%) of the overall growth in Dover town would ensure that the

majority of new residents would have good access to a suitable level of existing service provision. It would also help to address deprivation in the settlement through this approach. However, such significant increases in growth Dover could also result in infrastructure and facility capacity problems. Although it is expected that strategic sites would provide new services and facilities to meet their own needs, providing multiple developments of this type could result in some overburdening, depending upon the timing of new housing and service provision.

C.33 The delivery of the lower growth scenario (Growth Option 1) through Spatial Option D (adopted Plan Dover focus) could result in further congestion within Dover town which could intensify existing air pollution within its AQMAs. The high level of development in and around Dover town could also result in increased numbers of residents being affected by noise pollution. As is the case for Spatial Option C (settlement hierarchy).

C.34 Providing a lower overall level of growth (approximately 8%) at more rural locations could have variable impacts on rural deprivation in the plan area. This option would focus rural growth more towards the well serviced rural villages. This could help support more new substantial service provision at such rural settlements, however, some rural settlements would accommodate no new development meaning some service stagnation could result. A mixed significant positive and minor negative effect is therefore expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.35 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New sustainably located employment opportunities could help to address issues of deprivation and could also support the uptake of active travel in the plan area to benefit public health. This option would result in around 70% of employment land being delivered in and around Dover town which could help to address the higher levels of deprivation in this area. Through this medium development scenario the distribution of housing growth in the plan area could result in a high number of residents having good access to a wide range of services within Dover town, although impacts relating to potential overburdening of services and congestion within that settlement could still result. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.36 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also

deliver the additional employment land. Providing new employment land in close proximity to new housing could help to limit the need to travel in the Plan area; however, Growth Option 3 would result in a particularly large increase in the number of homes as well as the employment land in and around Dover town where there is greatest potential to exacerbate air quality and noise pollution issues. Through this higher level growth scenario the level of housing development at the more rural settlements would also be increased, although the distribution of development means that only the better serviced rural settlements would accommodate that growth. The more rural settlements of Ash and Eastry would both accommodate more than 200 homes which could support some small scale new service provision, but this option could also result in some wider stagnation of rural services at settlement that accommodate no new development. An overall mixed significant positive and minor negative effect is therefore expected for this option.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.37 Spatial Option E would allow for only a lowest level of development (approximately 20%) in and around Dover town where the strongest service provision in the District currently exists. Residents may be required to travel longer distances to access essential services not so readily available elsewhere in the District, such as higher learning facilities and hospitals, increasing reliance on private cars.

C.38 Spatial Option E focusses the greatest amount of growth at Deal, Sandwich and Aylesham. Although these settlements have their own services and facilities they are smaller and less diverse, increasing the possibility for them to become overburdened, particularly in Aylesham where services are more limited. However, it notes that strategic growth is likely to support the delivery of new service provision. It is noted that this option would provide many residents with access to railway services at Deal and Sandwich, which could allow for service access further afield.

C.39 While Spatial Option E (more even settlement focus) would be less likely to help address issues of deprivation in Dover District, it could address the higher levels of deprivation in Aylesham. Furthermore, this option would be less likely to intensify existing congestion and air quality issues associated with the M20/A20/A2 and the ferry terminal within Dover town. It would also avoid areas of higher noise pollution. Overall a mixed minor positive and significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.40 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New sustainable employment opportunities could help to address issues of deprivation and could also support the uptake of active travel in the plan area to benefit public health. This option would be less likely than others to address the higher deprivation in Dover District. Furthermore, issues relating to access to services and potential overburdening of existing provisions are also likely to remain. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.41 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. Providing new employment land in close proximity to new housing could help to limit the need to travel in the Plan area and encourage travel by active modes. However, while this option could help to limit the potential for increased congestion and air quality issues within Dover town, it could increase the overall need to travel in the Plan area. Increased numbers of homes within the north of the District could have detrimental effects on air quality directly to the north of the District boundary within the Thanet AQMA. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

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: Adopt- ed 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 effects likely		++/-- Mixed significant effects likely		--/+ Mixed significant negative and minor positive effects likely	

Spatial Option A (suitable sites)**Growth Option 1 (lowest growth)**

C.42 Focusing the highest level of housing development (approximately 76% of overall growth) in and around Dover town through Spatial Option A would provide opportunities to build on Dover's role as the District's most substantial job base. This approach could, however, result in intensification of existing congestion issues at the M20/A20/A2 towards this settlement considering the high number of new homes to be accommodated here. Increased levels of congestion could have adverse impacts on the viability of the town centre as well as the potential to attract new businesses to the plan area. There may be opportunities to accommodate this growth to the north and east of Dover town which may limit any increase in congestion at the M20/A20/A2. Furthermore, this option would provide a limited proportion (approximately 2%)

of the overall housing growth at Sandwich, the District's second largest job creator, thereby failing to make good use of all economic growth areas.

C.43 Accommodating a relatively large proportion of the overall housing growth (approximately 17%) at the rural villages could help to promote some rural economic development. However, it is likely that this option would result in many new residents having to commute long distances from rural locations to the nearby larger settlements. Overall a mixed minor positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth)

C.44 Growth Option 2 would provide additional employment land in the plan area coming forward on suitable and potentially suitable sites identified through the District's ELR. The distribution of employment growth in the plan area would

be delivered so that 68% would occur in and around Dover town. The position of this settlement as an international gateway may help to support stronger economic growth where employment land is delivered in this location. This option would not allow for any employment land at Deal meaning the issue of out-commuting from this settlement would not be addressed. Rural employment growth would be limited to Eastry and Ringwould through this option meaning there could be less potential to stimulate diversification of the rural economy. However, both settlements lie near to an A-road which may make them more viable for employment development than other more rural locations. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.45 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111 coming forward on suitable and potentially suitable sites identified through the District's HELAA. A slight shift in the focus of development would occur with Dover town accommodating around 56% of overall development, Aylesham accommodating 10% and the remaining more rural settlements 25%. The District's suitable and potentially suitable employment sites, identified through the District's ELR, would also be allocated. This approach could help to provide some uplift in the economy through higher housing delivery and the associated supply chains. It would also increase the potential number of employees in the area.

C.46 Through this option the increased number of homes provided in and around Dover town and Aylesham in particular is likely to help support the viability of settlement centre locations. However, the high level of new housing (almost 3,000 homes) across the rural settlements is likely to mean that many residents will have to travel longer distances to access employment. The rural employment growth would be limited to only 3% of the overall provision which would be much lower than the level of rural housing growth. Furthermore, the substantial number of new residents in and around Dover town could result in intensification of congestion issues at the M20/A20/A2 which might impact upon local economic growth. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.47 Spatial Option B would concentrate development in and around Dover town (approximately 39%) and Deal (approximately 28%). However, the proportion of development

to be provided in and around Dover town through this option would be more limited compared to other spatial options considered. Considering the reduced existing employment opportunities available at Deal this option would provide a substantial number of residents with reduced access to employment opportunities. Providing a higher proportion of development (approximately 25% in total) at more rural settlements is likely to result in increased numbers of residents having limited access to employment although new development at these locations, which could provide some impetus to achieve diversification of the rural economy, where appropriate.

C.48 In particular, through the low development scenario (Growth Option 1), this option would fail to locate a large amount of development at Sandwich which currently sees high levels of in-commuting and accommodates a large amount of employment land. Providing development at rural locations is likely to increase commuting distances for residents, while providing a high level of development at Deal may result in out-commuting by train to locations within and outside of the District. Overall a mixed minor positive and significant negative effect is expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.49 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. The distribution of housing growth in the plan area would still be delivered so that a high number of residents would be located at Deal where employment opportunities are currently relatively limited and a lower number of residents are provided at Sandwich where employment opportunities are stronger. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.50 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach could help to provide some uplift in the economy through higher housing delivery and the associated supply chains. It would also increase the potential number of employees in the area. The distribution of development would still be provided so that the areas with the highest number of job opportunities would accommodate a more limited proportion of overall development. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option C (settlement hierarchy)**Growth Option 1 (lowest growth)**

C.51 Spatial Option C would provide a high level of development (approximately 45%) in and around Dover town, the major jobs base in the District. This town is also an international gateway which could help support further job growth as development occurs. Sizeable levels of development at Deal, Sandwich and Aylesham would support good levels of access to job opportunities at most of these locations. The exception to this is likely to be Deal which does not provide immediate access to more sizeable employment sites.

C.52 This option is likely to be most beneficial to supporting the viability of the town centre locations in the plan area, which will further support the plan area as an attractive location for new businesses. Locating development with consideration for the areas of strongest service provision may also help to make it more attractive to employees. A mixed significant positive and minor negative effect is therefore expected for Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth)

C.53 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities. The distribution of housing growth in the plan area would be delivered so a substantial amount of employment and housing development is provided in and around Dover town. Employment land in this location may have increased potential for economic growth considering the position of this settlement as an international gateway. Providing some employment land at Deal could go some way to helping to address the potential lack of employment opportunities in this settlement. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.54 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach could help to provide some uplift in the economy through higher housing delivery and the associated supply chains. It would also increase the potential number of employees in the area. Importantly, the increased number of homes provided across the better serviced settlements is also likely to help support the viability of town centre locations. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.55 Spatial Option D would focus a high level of development (approximately 70%) in and around Dover town. This approach could build on the town's role as the District's main job base. Providing such a high level of development at the town is likely, however, to intensify existing traffic issues along the M20/A20/A2 towards the town and the ferry terminal which could impact on the viability of employment sites and the town centre.

C.56 This option would also provide only a small amount of amount of housing growth (approximately 5%) at Sandwich where there a large amount of employment land is currently accessible. By providing a lower level of rural housing growth it is likely that this option could help reduce the number of residents required to regularly commute longer distances. Focussing development more towards the well serviced rural settlements is likely to increase the potential for this effect. However, this approach is also less likely to support a far reaching comprehensive diversification of the rural economy. A mixed significant positive and significant negative effect is expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.57 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities. The distribution of employment growth in the plan area would be delivered so by far the highest level of development would occur at the Dover. The position of this settlement as an international gateway may help to support stronger economic growth but increasing the potential for localised congestion. This option would still provide limited development at Sandwich where a high number of employment opportunities are accessible. By allowing for some employment land to match housing growth at rural locations there will be more opportunity to diversify the rural economy with appropriate and compatible businesses. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.58 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach could help to provide some uplift in the economy through higher housing delivery and the associated supply chains. It would also increase the potential number of employees in the area. Through this option the increased number of homes provided

across the better serviced settlements (in particular in and around Dover town) is also likely to help support the viability of town centre locations. Focussing rural growth more towards the better serviced settlements could have similar benefits in these settlements. The substantial number of new residents in and around Dover town, however, could result in intensification of congestion issues at the M20/A20/A2 which might impact upon local economic growth. An overall mixed significant positive and minor negative effect is therefore expected for the highest level of growth.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.59 Spatial Option E is considered less likely to help build on the position of Dover as the main employment centre in the plan area when accommodating the lowest level of development (Growth Option 1). It is less likely to support the regeneration of the settlement and strengthened viability of the town centre which could help attract employees and new employers to the plan area. This option would provide a high proportion of the overall development (approximately 30%) at Deal where access to employment opportunities is more limited. The pattern of out-commuting in the District, from Deal in particular, to other locations in the plan area and beyond could be intensified through this option. While providing a relatively high proportion of housing growth at rural locations (approximately 15%) could help stimulate some rural employment growth, this is likely to further contribute to increasing numbers of residents having to regularly travel longer distances for work.

C.60 It is likely that Spatial Option E (more even settlement focus) could help limit the potential for greater levels of congestion along the A20/M20/A2 towards Dover, helping to maintain the ability of existing businesses to function and grow. Overall a mixed minor positive and significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.61 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities. The distribution of growth in the plan area would be delivered so that Deal, Sandwich and Aylesham accommodated relatively high level of development, with the level of development reduced in and around Dover town. This approach could help to limit the need for residents to commute out of Deal, in particular. However, the distribution of development would make limited use of Dover's position as an international gateway to support further job provision in the plan area. This option would require the highest amount of employment land at more rural settlements. While this would encourage the growth and diversification of the rural economy, this is likely only for businesses compatible with remote rural locations. Many of these sites will lack access to the strategic road network. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.62 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach could help to provide some uplift in the economy through higher housing delivery and the associated supply chains. It would also increase the potential number of employees in the area. Through this option the increased number of homes at Deal, Sandwich and Aylesham could support the viability of centres in the area. This highest development scenario would provide increased development towards Dover to support the viability of that settlement, but the level would be more limited than through other options. The higher level of development at rural locations could go some way to supporting appropriate and compatible types rural economic diversification. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

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: Adopt- ed 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 effects likely	Mixed significant effects likely			Mixed significant negative and minor positive effects likely	

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.63 Spatial Option A would focus the highest level of housing development (approximately 76% of overall growth) in and around Dover town. A relatively large proportion (approximately 17%) of the housing development would be provided at the identified rural villages. As such, this option would provide a high level of development at the largest settlement in the District where new residents could benefit from access to a high level of service provision, employment opportunities and sustainable transport links. This approach could result in some intensification of existing congestion which are noted to be present along the M20/A20/A2 to the south of Dover. Requiring such a high level of housing growth at one settlement could also result in capacity issues at existing services and facilities dependent upon the phasing of new service provision at new housing developments, encouraging travel elsewhere.

C.64 It is likely that providing such a high level of development at rural locations would result in increased need for new residents to travel longer distances to access services and facilities and jobs. Development in the rural areas could support new service provision and economic growth as well as supporting the sustainable transport network at rural locations, however, the net effect is likely to be an increased need for residents to travel. Overall a mixed minor positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth)

C.65 Growth Option 2 would provide additional employment land in the plan area coming forward on suitable and potentially suitable sites identified through the District's ELR. The distribution of employment growth in the plan area would be delivered so that 68% would occur at the Dover where a high number of residents could easily access them. This option would not allow for any employment land at Deal meaning the issue of out-commuting from this settlement would not be addressed. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.66 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111 coming forward on suitable and potentially suitable sites identified through the District's HELAA. A slight shift in the focus of development would occur with Dover accommodating around 56% of overall development, Aylesham 10% and the rural area 25%. The District's suitable and potentially suitable employment sites, identified through the District's ELR, would also be allocated. Through this approach a high number of residents in and around Dover town (which is to accommodate more than 6,800 homes) would have access to a range of services and facilities and jobs which could limit the need to travel as development occurs. The focus of such a high level of development at one settlement could result in issues of capacity at existing services which could disrupt local travel patterns. Furthermore, the high level of development could intensify congestion at the M20/A20/A2 towards Dover.

C.67 The increased number of homes provided at Aylesham could result in some increased service provision at this location, however, some residents are likely to need to travel longer distances to access essential services outside of this settlement. The need to travel longer distances to access services and employment is also likely to be influenced by the high level of new housing (almost 3,000 homes) across the rural settlements. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option B (Population Based)

Growth Option 1 (lowest growth)

C.68 Allowing for development which is provided in line with settlement size through Spatial Option B would result in Dover town (approximately 39%) and Deal (approximately 28%) accommodating high levels of development. Through this option, however, the proportion of development to be provided in and around Dover town would be reduced in comparison to other options considered. Dover town residents would benefit from access to a range of existing services and facilities as well as employment opportunities in Dover town. Access is also provided in Dover town to two railway stations, including

the High Speed 1 railway route to London, which could further encourage modal shift among residents. In contrast, while those residents at Deal would have relatively easy access to a range of services and facilities and railway services they would be more likely to have to commute to access employment opportunities considering the lower number of employment sites in the immediate surrounding area.

C.69 While Spatial Option B (population based) provides a comparatively small amount of development (approximately 4%) at Aylesham where the service offer is currently relatively weak, it would also provide a small amount of development (approximately 4%) at Sandwich. Residents at Aylesham may have to travel to access services and facilities (although they could make use of railway station at the settlement), but development at Sandwich would benefit from access to strong service provision as well as a high number of employment opportunities compared to other parts of the District. The option would also allow for a high amount of the overall growth (approximately 26%) in the more rural villages where service provision and employment opportunities are more limited. This portion of the overall housing growth could help to promote some level of rural service provision but it is likely that it would have the overall effect of further contributing to need for a large number of new residents needing to travel longer distances more regularly. Overall a mixed minor positive and significant negative effect is expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.70 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents.

C.71 The additional employment land at Deal could go some way to help address the relatively high level of housing at this location where employment opportunities are currently relatively limited. Allowing for a matched level of employment growth at rural locations could provide some local employment opportunities for residents at these locations, but such a disparate distribution of future growth will increase road travel and congestion. Furthermore, it is noted that new employment opportunities may be limited by the more limited infrastructure at these locations. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.72 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also

deliver the additional employment land. This approach would increase the number of residents in the plan area and therefore the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also. While new employment land at Deal could help address the issue of high out-commuting from this location, providing further residents at this location could act to further exacerbate this issue. Increased levels of housing in and around Dover town could also increase the potential for congestion at the A20/M20/A2 in that settlement. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option C (settlement hierarchy)

Growth Option 1 (lowest growth)

C.73 Spatial Option C would provide the highest levels of development at settlements which have been identified as the most sustainable through the settlement hierarchy in terms of their access to services and facilities and employment opportunities. Dover would accommodate a substantial level of the overall development (approximately 45%). Even through the low development scenario (Growth Option 1) sizeable levels of development would also occur at Deal, Sandwich and Aylesham. Some of these settlements are noted to have more limited service provision (notably Aylesham) or employment opportunities (notably Deal) but all settlements benefit from access to a railway station.

C.74 The proportionate approach to the level of growth to be provided at the more sustainable rural settlements of the plan area could help to prevent the stagnation of existing service provision at these locations. Spatial Option C (settlement hierarchy) could therefore help limit any increase in the level of travel required regularly from rural locations in the District.

C.75 Accommodating a large amount of development in and around Dover town could, however, have adverse impacts on existing congestion which results along the A20/M20/A2, some of which is associated with the ferry terminal at the settlement. Overall a mixed significant positive and minor negative effect is expected for Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth)

C.76 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents. The distribution of growth set out for Deal in particular could go some way to reduce the need for long distance commuting in the plan area from this

settlement. By providing some employment land at the more rural settlements, residents at these locations could have access to nearby jobs. Through a distribution of development by settlement hierarchy the level of employment land for the rural villages would be relatively limited (approximately 10%) which would reduce the potential for any increased commuting to these areas from the larger settlements. In any case, the potential for large scale employment opportunities at rural locations may be limited by the more limited infrastructure at these locations. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.77 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also. It is likely that similar effects to the low and medium levels of growth would result in terms of access to services and employment opportunities across Aylesham, Sandwich and Deal. At these locations there may be increased potential for some strengthening of the service offer as higher levels of residential growth occur.

C.78 The increased level of housing in and around Dover town would provide some residents with access to a wider range of services and facilities but is also likely to increase the potential for congestion at the A20/M20/A2 in that settlement. The higher level of development at this settlement could also have some impacts in terms of the capacities of services and facilities at this location. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth. Uncertainty is attached for this option given that the level of access to services and facilities in and around Dover town will be influenced by how successfully new development can be integrated and phased to limit the potential overburdening of existing provisions.

Spatial Option D (adopted plan Dover focus)

Growth Option 1 (lowest growth)

C.79 Through Spatial Option D a high level of development (approximately 70%) would be focused in and around Dover. This approach would make best use of the town's role as the District's main job base and most significant service provider. It would also provide residents with access to rail services within the town. Even through the lowest level of growth (Growth Option 1) focussing such a high proportion of growth at the town could, however, intensify existing traffic issues

along the M20/A20/A2 towards the town and the ferry terminal.

C.80 Strategic scale development is expected to provide new services and facilities to meet its own needs, but there is the possibility of causing capacity issues at existing services within Dover District, particularly in the short term. Therefore, this option could result in the need for some residents to travel further by private car to access certain services and facilities.

C.81 The rural portion of growth set out through this option focusses on the larger villages, helping to support their existing service provision and reduce the need for some residents to travel. Overall a mixed significant positive and significant negative effect is expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.82 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents. Compared to other options, this option would provide little employment development at Deal from which high levels of commuting are noted to occur. It would also maintain a level of development in and around Dover town which could intensify congestion issues at the A20/M20/A2.

C.83 This option would focus rural employment development more towards the well serviced rural villages. By focusing employment growth to a more limited number of rural locations, this approach would only provide some rural residents with nearby access to new job opportunities. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.84 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also.

C.85 Focussing higher levels of new homes more towards the well serviced rural villages is likely to strengthen them in terms of the new services and sustainable transport links they could support, but increase the need for new residents to travel for work and more substantial services and facilities. Through this option the particularly high level of level of housing in and around Dover town would provide some residents with access

to a wider range of services and facilities but is also likely to generate detrimental impacts in terms of congestion at the A20/M20/A2. The higher level of development at this settlement could also have some impacts in terms of the capacities of services and facilities at this location, requiring people to travel farther afield. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.86 Spatial Option E is considered less likely to make best use of the existing strong employment offer and wider range of services and facilities access in and around Dover town. Even through the lowest level of growth (Growth Option 1) providing a high proportion of the overall development (approximately 30%) at Deal where access to employment opportunities is more limited could result in higher numbers of new residents having to travel longer distances for work. There is also more limited service provision at Aylesham, but the sites around this settlement have relatively good access to its railway services.

C.87 This option would also provide a relatively high proportion of housing growth at rural locations (approximately 15%) which could help stimulate some rural employment growth and support rural service provision. This element of growth could also contribute substantially to the numbers of residents having to regularly travel longer distances by private car for work and to access services and facilities. Overall a mixed minor positive and significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.88 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with

local employment opportunities which could reduce the need to travel for some residents. This option would better help to address the issue of out-commuting from Deal considering the increased level of employment land at this settlement.

C.89 Through this option most rural villages would accommodate some new employment land to match the distribution of rural housing growth. This approach could help to provide some rural employment opportunities to limit the need to commute from the smaller settlements, but such a disparate distribution of future growth will increase road travel and congestion. Furthermore, new employment development at more rural locations might be limited by infrastructure constraints at these locations. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.90 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also.

C.91 Focussing the majority of growth in the smaller settlements of Deal, Sandwich and Aylesham and the wider rural villages will continue to require significant commuting distances and travel to access services and facilities in Dover District. It is noted that relatively high levels of employment land to be provided at Deal through this option would go some way to help address the issue of out-commuting from this location. This option would also help to limit the potential to exacerbate congestion issues at the A20/M20/A2 in and around Dover town. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

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: Adopt- ed 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					
--					
Significant negative effect likely					

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.92 By providing a particularly high proportion (approximately 76%) of overall housing development in and around Dover town Spatial Option A could result in adverse impacts in relation to the capacity of the sewerage infrastructure towards Whitfield. This element of housing development could also have adverse impacts relating to water quality at this settlement considering the SPZs which surround it. The more developed nature of Dover is likely to help limit the potential for loss of higher value soils and impacts on mineral resources in the District. It may also provide increased opportunities for re-use of brownfield land.

C.93 Spatial Option A (suitable sites) would accommodate approximately 17% of the overall housing development at the rural villages. Given the less developed nature of these areas the potential for loss of greenfield land to development is significantly increased. Overall a significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.94 Growth Options 2 and 3 would provide increased levels of employment land alongside higher levels of housing growth, respectively. The new employment growth would be accommodated on suitable and potentially suitable employment sites identified through the District's ELR, while the greater scale of residential development would be accommodated on the potentially suitable residential sites (alongside the suitable sites) identified in the District's HELAA. For example, higher overall land take around Aylesham through these options may result in more development on green field land designated as SPZ II, for brickearth minerals and Grade II agricultural land. Similarly, increased development in and around Dover town may increase existing pressures on the sewerage infrastructure at Whitfield. Finally, the increased level of rural development set out through the high growth scenario (increased to approximately 25% of overall growth) could also result in increased greenfield land take in the plan area given the likely reduced opportunities for brownfield development at these locations. Therefore, both the medium and high growth scenarios are likely to increase

the potential for the significant negative effects against SA objective 5.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.95 Spatial Option B would bring forward the approximately 39% of growth to Dover and approximately 28% to Deal. The proportion of development to be provided in and around Dover town through this option, however, would be reduced in comparison to other options considered. Even through the lower growth scenario (Growth Option 1) housing growth in and around Dover town and Deal is likely to result in development occurring within SPZs given that the settlements are constrained in most directions by these designations. It may also result in additional pressures on the sewerage capacity at Whitfield, although new development may support the provision of new infrastructure to address this issue.

C.96 Spatial Option B (population based) would allow for a high level of housing growth (approximately 26%) at the rural villages. Allowing for higher levels of development at areas which have historically accommodated lower levels of development may provide limited opportunities to make use of brownfield land, therefore resulting in higher greenfield land take, increasing the likelihood of the sterilisation of mineral and agricultural resources, particularly in the north of the District. Overall a significant negative effect is expected for this option.

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.97 Growth Options 2 and 3 would increase the scale growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, increasing the loss of the natural resources that surround these settlements. Furthermore, the sewage treatment infrastructure would be put under greater strain, increasing the significance of the significant negative effect recorded against SA objective 5.

Spatial Option C (settlement hierarchy)**Growth Option 1 (lowest growth)**

C.98 Spatial Option C focusses growth at the District's services centres: Dover (approximately 45%), Deal (approximately 20%), Sandwich (approximately 15%) and Aylesham (approximately 10%), all of which are surrounded by some form of sensitive natural resource.

C.99 Dover growth impacts on water quality relating to development within SPZs and wastewater capacity to the north of the settlement at Whitefield – even through the low growth scenario (Growth Option 1). Development at Deal may result in impacts on SPZs, MSAs and Grade I agricultural land, although the land to the south of Walmer is slightly less resource sensitive.

C.100 Development at Sandwich is likely to result in loss of higher value Grade I and II agricultural land. Development directly to the south of this settlement could also sterilise some of the District's brickearth mineral resource. There may be some opportunity to provide housing to the south west of the settlement where impacts on Grade I agricultural land are likely to occur, but development would not fall within an SPZ or an MSA. Development at Aylesham within the District is likely to result in loss of Grade II agricultural land and fall within an SPZ.

C.101 However, Spatial Option C (settlement hierarchy) would provide a lower proportion of the overall growth at the rural villages (approximately 10%) which might otherwise result in increased loss of greenfield land to development. However, overall, significant expansions at the other settlements is likely to result in significant negative effects against this SA objective.

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.102 Growth Options 2 and 3 would increase the scale growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, increasing the loss of the natural resources that surround these settlements and up the sewage treatment infrastructure under greater strain, increasing the significance of the significant negative effect recorded against SA objective 5.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.103 Spatial Option D would focus most growth (approximately 70%) in and around Dover town. This approach would have potential to impact upon the capacity of

sewerage infrastructure in Whitefield. Furthermore, the areas SPZs would also be more at risk. Focusing much of the development towards Dover is likely to help limit the potential for loss of higher value soils and impacts on mineral resources in the District which are likely to result where development occurs between Sandwich and Deal or Sandwich and Aylesham. The lower levels of development provided in particular at Deal and Sandwich are likely to support the delivery of housing growth at locations which are less constrained by these types of receptors.

C.104 As the largest settlement in the District, Dover offers the greatest opportunity to reuse brownfield land and limit the level of greenfield land take. It is noted, however, that the scale of development to be provided is likely to mean that most development would occur at the settlement edge where opportunities for the re-use of existing brownfield sites are likely to be more limited. This option offers the greatest potential to minimise adverse effects on the District's natural resources, but some loss is likely to be unavoidable and significant. Therefore, overall a significant negative effect is still expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.105 Growth Options 2 and 3 would increase the scale growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, increasing the loss of the natural resources that surround these settlements and up the sewage treatment infrastructure under greater strain, increasing the significance of the significant negative effect recorded against SA objective 5.

Spatial Option E (more even settlement focus)**Growth Option 1 (lowest growth)**

C.106 Spatial Option E would allow for a low level of the overall development (approximately 20%) for the District in Dover town. This option is, therefore, considered likely to have limited potential to achieve development of high number of brownfield sites. A relatively high level of housing growth is to be delivered at Deal (approximately 30%) and Sandwich (approximately 20%) through this option. Opportunities to achieve the level of growth required at these settlements without resulting in impacts on areas designated as SPZs, MSAs and higher value soils (at Sandwich in particular) are likely to be more limited. Aylesham is less constrained by MSAs, but development at this settlement (within Dover District) is likely to result in additional impacts on water quality (due to the presence of the SPZ) and Grade 2 agricultural soils.

C.107 Through Spatial Option E (more even settlement focus) approximately 15% of housing growth would be provided at rural locations. There are considered to be fewer opportunities for the re-use of brownfield land in these rural locations. Therefore, overall a significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.108 Growth Options 2 and 3 would increase the scale growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, increasing the loss of the natural resources that surround these settlements and up the sewage treatment infrastructure under greater strain, increasing the significance of the significant negative effect recorded against SA objective 5.

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	--/+	--/+	++/--	++/--	--/+
Key					
++/- Mixed significant positive and minor negative effects likely		++/-- Mixed minor or significant effects likely		--/+ Mixed significant negative and minor positive effects likely	

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.109 Spatial Option A would focus the highest proportion of housing growth (approximately 76%) in and around Dover town with the rural villages of the plan area also accommodating a large proportion (approximately 17%) of that growth. This option would therefore provide a large number of new residents at locations where they would benefit from access to a high level of service provision, employment opportunities and sustainable transport links.

C.110 Concentrating such a high proportion of overall housing growth at one settlement could, however, result in particularly high levels of traffic here. Intensification of existing congestion which are be present along the M20/A20/A2 to the south of Dover and furthering of air quality issues within the AQMAs at the settlement could occur.

C.111 This option would place only small proportions of the overall housing growth at the other larger settlements of Deal, Sandwich and Aylesham which also benefit from relatively

strong service provision. Instead by providing a high proportion (approximately 17%) of development at rural locations this option could result in increased need for new residents to travel longer distances to access services and facilities and jobs. Providing a level of housing development at more rural locations is likely to support some level of service provision and there is potential to provide some rural economic growth. However, overall this is likely to contribute to an increased need for residents to travel. The level of housing development at the individual rural settlements is unlikely to be of a scale to support substantial new service provision. A mixed minor positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (Medium Growth)

C.112 Growth Option 2 would provide additional employment land in the plan area coming forward on suitable and potentially suitable sites identified through the District's ELR.

C.113 The distribution of employment growth in the plan area would be delivered so that 68% would occur at the Dover where a high number of residents could easily access them.

Although this would provide greater opportunities for less polluting modes of transport it is also likely to increase road congestion in close proximity to the District's only AQMAs. This option would not allow for any employment land at Deal meaning the issue of out-commuting from this settlement would not be addressed. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.114 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111 coming forward on suitable and potentially suitable sites identified through the District's HELAA. A slight shift in the focus of development would occur with Dover accommodating around 56% of overall development, Aylesham 10% and the rural area 25%. The District's suitable and potentially suitable employment sites, identified through the District's ELR, would also be allocated. Significant growth in and around Dover town would increase air pollution in close proximity to the Districts AQMAs, but also offer opportunities to increase use of sustainable modes of transport.

C.115 The increased number of homes provided at Aylesham could result in some increased service provision at this location, however, some residents are likely to need to travel longer distances to access essential services outside of this settlement. The need to travel longer distances to access services and employment is also likely to be influenced by the high level of new housing (almost 3,000 homes) across the rural settlements. Increased need to travel from the smaller settlements in the plan area is likely to be detrimental to air quality in the plan area. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.116 Through Spatial Option B the highest level of development would occur in and around Dover town (approximately 39%) and Deal (approximately 28%). Dover accommodates a lower level of development through this option compared to other options considered. It would also result in a higher proportion of development (approximately 25% in total) at more rural settlements. This option would be less likely to result in increased levels of traffic in Dover town and its AQMAs compared to Spatial Option A (suitable sites). However, this option could result in increased need to travel longer distances from rural locations to access services and facilities as well as employment opportunities. Deal provides access to a strong service offer, however, employment

opportunities at this location are more limited compared to other nearby larger settlements and many residents regularly have to commute out of the area. Therefore, this option could result in some residents have to travel longer distances for work.

C.117 While rural development could help support some level of service provision at these locations and growth of the rural economy, the distribution of development across a relatively high number of rural locations will likely mean that the level of growth to provide certain services and facilities will not occur. Providing a high level of rural growth would also be less likely to make use of the existing railway services in Dover District, given the location of most stations within the larger settlements. It is also noted that there may be opportunities to promote the viability of rural bus services through this option. Overall a mixed minor positive and minor negative effect is expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.118 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents with associated benefits in terms of air quality. The additional employment land at Deal could go some way to help address the relatively high level of housing at this location where employment opportunities are currently relatively limited. Similarly, delivering employment growth at rural locations would minimise some out-commuting in the rural communities, but increase in-commuting. An overall mixed minor positive and minor negative effect is expected for the medium level of growth.

Growth Option 3 (highest growth)

C.119 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach would increase the number of residents in the plan area and therefore the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also with adverse impacts on local air quality.

C.120 While new employment land at Deal could help address the issue of high out-commuting from this location, providing further housing (to around 3,400 homes) at this location could act to further exacerbate this issue. Increased levels of housing in and around Dover town (to approximately 4,600 homes) could also increase the potential for congestion at the A20/M20/A2 in that settlement. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option C (settlement hierarchy)**Growth Option 1 (lowest growth)**

C.121 Spatial Option C focussed growth in the settlements with the greatest range of services and facilities. The highest level of new development (approximately 45%) would be delivered in and around Dover town where service and job provision is strongest. The position of the town as an international port means there is potential for further economic growth to support residential development in the area. More limited but still sizeable levels of housing development would also occur through this option at Deal, Sandwich and Aylesham.

C.122 It is noted that out-commuting could still result from Deal where a sizeable amount of growth is to be delivered, but the amount of growth would be less than that supported through Growth Option 1 (lowest growth). Furthermore, the existing air quality issues and congestion associated with the two AQMAs and M20/A20 route in Dover town could be intensified through this option.

C.123 The allocation of 10% of growth to the most well served rural settlements would increase road traffic across the District; however, this would be mitigated through the maintenance and use of the rural bus services. A mixed significant positive and minor negative effect is expected for Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth)

C.124 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents and potential increases in air pollution. The distribution of growth set out for Deal in particular could go some way to reduce the need for long distance commuting in the plan area from this settlement. By providing some employment land at the more rural settlements, residents at these locations could have access to nearby jobs, although under this spatial option the allocation of employment land in the rural area would be relatively limited (approximately 10%), minimising in-commuting to these areas from the larger settlements. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.125 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the

overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities and associated increases in air pollution would be likely to increase. It is likely that similar effects to the low and medium levels of growth would result in terms of access to services and employment opportunities across Aylesham, Sandwich and Deal. At these locations there may be increased potential for some strengthening of the service offer as higher levels of residential growth occur.

C.126 The increased level of housing in and around Dover town (to approximately 5,400 homes) would provide some residents with access to a wider range of services and facilities but is also likely to increase the potential for congestion at the A20/M20/A2 in that settlement. This could have implications in terms of air quality within the two AQMAs in the settlement. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.127 Requiring a very high level of the development (approximately 70%) in Dover town would ensure that some residents have access to a suitable level of existing service provision as well as employment opportunities and sustainable transport links, but it also most likely to result in further congestion within Dover town and its AQMAs.

C.128 Spatial Option D (adopted Plan Dover focus) could reduce the need for residents to travel from rural locations given that it would provide a comparatively reduced level of growth (approximately 8%) at these locations. Furthermore, growth is to be provided more towards the well served rural villages. Concentrating rural development to these locations could help to support more substantial service provision at these locations. However, this option is less likely to provide support for rural service provision across the District which could mean some residents have to travel longer distances on a regular basis. A mixed significant positive and significant negative effect is therefore expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.129 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents. Compared to other options, this option would provide little employment development at Deal

from which high levels of commuting are noted to occur. It would also maintain a level of development in and around Dover town which could intensify congestion issues at the A20/M20/A2 and air pollution within the AQMAs there.

C.130 This option would only deliver rural employment development in the more well serviced villages. By focusing employment growth to a more limited number of rural locations, this approach would only provide some rural residents with nearby access to new job opportunities. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.131 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also. This is likely to adversely affect air quality.

C.132 Focussing higher levels of growth in and around Dover town would provide some residents with access to a wider range of services and facilities but is also likely to detrimental impacts in terms of congestion at the A20/M20/A2 and increased traffic within the AQMAs. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.133 Spatial Option E would deliver considerably less development in and around Dover (approximately 20%) in favour of a more even settlement focus. This approach would fail to make best use of the existing strongest service provision and employment opportunities in the District, although this would be balanced against the potential to limit traffic within and around Dover, including the AQMAs. However, some new residents would likely travel to and from Dover town for work and specialist services and facilities (such as higher learning centres) which are only provided in Dover town.

C.134 At Deal and Sandwich, residents could make use of these settlement's local services and facilities and their railway services to access services and job opportunities in other areas which is likely to help limit impacts on air quality. Development to the north of the District at Sandwich may encourage travel towards Thanet the larger settlements of Ramsgate and Margate. The higher level of overall development (approximately 20%) to be provided at Sandwich through this option could result in increased traffic within the Thanet AQMA to the detriment of air quality directly to the north of the District boundary. Overall a mixed minor positive and significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.135 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents. This option would better help to address the issue of out-commuting from Deal considering the increased level of employment land at this settlement.

C.136 Through this option most rural villages would accommodate some new employment land to match the distribution of rural housing growth. This approach could help to provide some rural employment opportunities to limit the need to commute from the smaller settlements, but it is also likely to generate some in-commuting from elsewhere. Overall a mixed minor positive and significant negative effect is expected for the medium level of growth.

Growth Option 3 (highest growth)

C.137 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities and associated levels of air pollution are likely to increase also. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

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: Adopt- ed 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					
--			-		
Significant negative effect likely			Minor negative effect likely		

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.138 Spatial Option A would focus a substantial proportion (approximately 76%) of the overall growth in and around Dover town. Dover is generally less constrained by flood risk than Deal and Sandwich to the north, but many of the suitable and potentially suitable sites fall within areas of potential fluvial and surface water flooding associated with the River Dour and its tributaries.

C.139 This option would provide only a small proportion of housing development at Deal (approximately 5%) and Sandwich (approximately 2%), with the rural villages accommodating a large proportion (approximately 17%) of that growth instead; however the vast majority of these sites fall outside of notable areas of flood risk.

C.140 Notable rural villages constrained by some flood risk including Ash and Wingham. Although the vast majority of the smaller settlements are free from strategic flood risk, growth in these locations will generally result in a significant loss of greenfield land, increasing the general area of impermeable surface. Therefore, overall, a significant negative effect is expected for Spatial Option A (suitable sites). This effect is recorded as uncertain given the potential for these effects to be avoided across a significant proportion of the sites identified.

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.141 Growth Options 2 and 3 would increase the scale of growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, increasing the loss of permeable greenfield land and the risk of development in areas of notable flood risk and therefore increasing the significance of the significant negative effect recorded against SA objective 7. However, it should be noted that the location and general extent of the suitable and potentially suitable employment sites in the District (relevant to Growth Options 2 and 3) and the potentially suitable HELAA

sites in the District (relevant to Growth Option 3) are largely outside of known areas of flood risk. Therefore, increase in significance of the recorded adverse effects is not considered to be considerably more. Again, these effects are recorded as uncertain given the potential for these effects to be avoided across a significant proportion of the sites identified.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.142 Spatial Option B would provide a high level of growth at the larger settlements of the plan area given their larger existing populations. Dover, the vast majority of which is not at risk of flooding would receive approximately 39% of the growth. However, Deal has considerable flood risks and is allocated approximately 28% of growth. Although a significant proportion of this growth could be provided to the south of the settlement where flood risk is lower, such a significant scale of growth is unlikely to completely avoid the risk.

C.143 Spatial Option B (population based) would also distribute 26% of the growth amongst the rural villages. The less developed nature of these areas may mean that a higher level of greenfield land take may result through this element of the housing growth. Therefore, the level of impermeable surfaces may be greatly increased through this option which may further contribute to flood risk. A significant negative effect is therefore expected for Spatial Option B (population based).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.144 Growth Options 2 and 3 would increase the scale of growth across all notable settlements. Although the majority of additional growth would be directed towards Dover where there is relatively lower flood risk, flood prone Deal and Sandwich would also receive significantly more growth, as would the rural villages. Greater growth increases the potential for adverse effects against this objective. Therefore,

a significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option C (settlement hierarchy)

Growth Option 1 (lowest growth)

C.145 Focussing development in-line with the settlement hierarchy under Spatial Option C would provide a high level of growth at the larger settlements of the plan area given the greater range of services and facilities. Dover, the vast majority of which is not at risk of flooding would receive approximately 45% of the growth. However, Deal and Sandwich have considerable flood risks and are allocated approximately 20% and 15% of the growth, respectively. Although a significant proportion of this growth could be provided outside of the areas of flood risk, such a significant scale of growth is unlikely to completely avoid the risk. Furthermore, although Spatial Option C (settlement hierarchy) would direct a relatively small proportion of growth to the District's most well serviced villages (10%), these allocations would largely result in the loss of greenfield land, increasing the extent of impermeable surfaces across the District. A significant negative effect is therefore expected for Spatial Option B (population based).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.146 Growth Options 2 and 3 would increase the scale growth across all larger settlements, and several of the well serviced villages. Although the majority of additional growth would be directed towards Dover where there is relatively lower flood risk, flood prone Deal and Sandwich would also receive significantly more growth, as would some rural villages. Greater growth increases the potential for adverse effects against this objective. Therefore, a significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option D (adopted plan Dover focus)

Growth Option 1 (lowest growth)

C.147 Through Spatial Option D a substantial proportion (approximately 70%) of the overall growth would be provided in and around Dover town. While areas of the town are affected by flood risk associated with the River Dour, Dover is less constrained than Deal and Sandwich. Relatively little growth is earmarked for the settlements constrained most by flood risk, notably Deal (10%) and Sandwich (5%).

C.148 Spatial Option D (adopted Plan Dover focus) would also result in a relatively small proportion of the overall growth

occurring at the rural villages. This element of the option combined with the higher amount of overall development to occur at the largest settlement where more brownfield land may be available for development may help to limit the proliferation of impermeable surfaces in the plan area. Overall an uncertain minor negative effect is expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.149 Growth Options 2 and 3 would increase the scale growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, although the vast majority of additional growth would be directed towards Dover where there is relatively lower flood risk and there is the greater opportunity to avoid and develop brownfield sites. Although greater growth increases the potential for adverse effects against this objective, there is considered to be sufficient land that is unconstrained around the allocated settlements for the risk not to increase significantly. Therefore, an uncertain minor negative effect is also expected for Spatial Option D (adopted Plan Dover focus) and the medium and highest growth scenarios.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.150 Spatial Option E would provide a more limited proportion (approximately 20%) of the overall growth for the Plan area in and around Dover town where there is a relatively low risk of flooding. To accommodate the required growth in the Plan area more housing would be focused at Deal (30%) and Sandwich (20%) where there is considerably greater risk. This scale of growth is unlikely to completely avoid areas of flood risk in these settlements. Furthermore, Aylesham and the wider rural villages are to be allocated 15% of the growth each. These particularly rural locations are therefore likely to result in the greatest loss of permeable greenfield land. Therefore, overall a significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.151 Growth Options 2 and 3 would increase the scale growth across the District, particularly at Deal, Sandwich, Aylesham and the rural villages. Again, the increase in the scale of growth in some of the areas of the District most at risk from flooding is likely to significantly increase the significance of the adverse effects identified. Furthermore, these options are likely to result in the most significant scales of greenfield

loss. Therefore, a significant negative effect is also expected for the medium and highest growth scenarios.

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: Adopt- ed 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 effects likely	++/-- Mixed significant effects likely			--/+ Mixed significant negative and minor positive effects likely	

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.152 Focusing a particularly high proportion of housing growth (approximately 76%) in and around Dover town would be required though Spatial Option A, with the rural villages of the plan area also accommodating a large proportion (approximately 17%) of growth. Those residents in and around Dover town would benefit from access to a service provision, employment opportunities and sustainable transport links in the District.

C.153 Service provision is also noted to be strong at the other larger settlements of Deal and Sandwich (and Aylesham to a lesser extent). This option would provide relatively small levels of housing growth at these locations, instead focusing a relatively high proportion (approximately 17%) of development at rural locations. Therefore, this option is likely to result in increased numbers of residents at rural locations where there is increased need to travel longer distances to access services and facilities and jobs. This element of Spatial Option A (suitable sites) may provide support for existing rural services and some new rural service provision; however, the smaller scale of development distributed to a higher number of locations is likely to mean any new provision is not substantial. Furthermore, the more disparate nature of this element of housing growth is less likely to support connections to lower carbon and more sustainable energy sources, which generally require a certain critical mass to be viable. Overall a mixed

minor positive and significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth)

C.154 Growth Option 2 would provide additional employment land in the plan area coming forward on suitable and potentially suitable sites identified through the District's ELR. The distribution of employment growth in the plan area would be delivered so that 68% would occur at the Dover where a high number of residents could easily access them. This element of development is therefore likely to promote the use of more sustainable modes of transport which would limit any increase in the District's carbon footprint. This option would not allow for any employment land at Deal meaning the issue of out-commuting from this settlement would not be addressed. An overall mixed significant positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.155 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111 coming forward on suitable and potentially suitable sites identified through the District's HELAA. A slight shift in the focus of development would occur with Dover accommodating around 56% of overall development, Aylesham 10% and the rural area 25%. The District's suitable and potentially suitable employment sites, identified through the District's ELR, would

also be allocated. Through this approach a high number of residents in and around Dover town (6,800 homes) would have access to a range of services and facilities and jobs which could limit the need to travel. The focus of such a high level of development at one settlement could result in issues of capacity at existing services which could disrupt local travel patterns with associated implication for carbon emissions.

C.156 The increased number of homes provided at Aylesham could result in some increased service provision at this location; however, some residents are likely to need to travel longer distances to access essential services outside of this settlement. The need to travel longer distances to access services and employment is also likely to be influenced by the high level of new housing (almost 3,000 homes) across the rural settlements. Increased need to travel from many of the locations included for new housing development through the highest growth scenario is likely to result in substantially higher carbon emissions. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.157 Spatial Option B would result in Dover town (approximately 39%) and Deal (approximately 28%) accommodating the highest levels of development given that these settlements currently accommodate the largest proportions of the population in the District. Residents in and around Dover town would benefit from access to the widest range of existing services and facilities in the District as well as a strong employment offer compared to other locations in plan area. Access is also provided in Dover town to two railway stations, including the High Speed 1 railway route to London, which could further encourage modal shift among residents. The accessibility of two railway stations within the town could further limit the need for residents to make use of private vehicles.

C.158 New housing development at Deal would also provide residents with access to a range of services and facilities. However, Deal has more limited access to employment opportunities so development at this settlement could result in a continuation of the existing out-commuting pattern which exists in this area.

C.159 Aylesham and Sandwich would accommodate a relatively low proportion of overall development (approximately 4% each) through Spatial Option B (population based). Aylesham has relatively limited service provision compared to Sandwich and the other larger settlements. Therefore, new residents at Aylesham are likely to have to travel to access certain services and facilities (although they could make use

of the railway station at the settlement). Whereas new residents at Sandwich would benefit from access to strong service provision and more employment opportunities compared to other parts of the District.

C.160 A high proportion of overall growth (approximately 28%) under this option would be distributed amongst the District's rural villages. Service provision and employment opportunities, as well as sustainable transport links, are more limited at these locations. The more notable exception to this is the stronger service offer at Ash, but Ash does not benefit from the same range of services and facilities as the larger settlements. This would further contribute to more traffic in rural areas, and therefore carbon emissions.

C.161 It is also likely that distributing a higher proportion of housing growth to a larger number of rural locations would be less likely to support investment in energy efficiency and renewable energy technologies. Overall a mixed minor positive and significant negative effect is expected for Spatial Option B (population based).

Growth Option 2 (medium growth)

C.162 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents. The additional employment land at Deal could go some way to helping to address the relatively high levels of out-commuting. Similarly, delivering more employment growth in rural locations could provide some local employment opportunities for residents at these locations, helping to minimise travel for immediate local populations, but it is equally likely to increase extensive out-commuting to disparate rural areas. It is also noted that new employment opportunities may be limited by the more limited infrastructure at these locations. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.163 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. This approach would increase the number of residents in the plan area and therefore the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase also with associated effects in terms of increased carbon emissions. While new employment land at Deal could help address the issue of high out-commuting from this location, providing additional housing (to total around 2,500 homes) at this location could act to further exacerbate

this issue. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option C (Settlement Hierarchy)

Growth Option 1 (lowest growth)

C.164 Spatial Option C makes use of the existing settlement hierarchy in the plan area, delivering the most development to the settlements with the most services and facilities. Dover received approximately 45%, Deal approximately 20% and Sandwich approximately 15%. These settlements benefit from access to a railway station, as does Aylesham which would accommodate 10% of the overall development to be delivered. Aylesham has fewer services and facilities than the larger settlements.

C.165 Similarly, the rural villages with services and facilities have also been allocated growth, helping to maintain the self-sufficiency of these smaller communities. This approach could therefore prevent residents at rural locations needing to travel regularly to access some services and facilities.

C.166 Locating a significant amount of growth in and around Dover town, Deal and Sandwich offers many new residents access to the widest range of services and facilities and employment opportunities in the District accessible by low carbon modes of transport. Overall a mixed significant positive and minor negative effect is expected for Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth)

C.167 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents.

C.168 The distribution of growth set out for Deal in particular could go some way to reduce the need for long distance commuting in the plan area from this settlement. By providing some employment land at the more rural settlements, residents at these locations could have access to nearby jobs, although the distribution of employment land to the most services rural villages would be relatively limited (approximately 10%), limiting the likelihood that such sites will generate significant amounts of additional road traffic and therefore carbon emissions. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.169 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By significantly increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to significantly increase also. It is likely that similar effects to the lower and medium levels of growth would be generated through good access to services and employment opportunities across Dover, Sandwich and Deal, which offers many new residents access to the widest range of services and facilities and employment opportunities in the District accessible by low carbon modes of transport. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option D (adopted plan Dover focus)

Growth Option 1 (lowest growth)

C.170 Focusing a higher proportion (approximately 70%) of housing growth in and around Dover town through Spatial Option D would provide a large number of residents with access to the main job base and the widest range of services and facilities in the plan area. Residents would also benefit from access to the two railway stations in the settlement, dependent upon the precise location of new housing growth. Even through the low growth scenario, however, the highest level of development at the settlement could intensify existing traffic issues along the A2/M20/A20 towards the town and the ferry terminal, which could have impacts on commuting patterns and carbon emissions resulting from this.

C.171 Spatial Option D (adopted Plan Dover focus) minimises growth in the rural areas to the larger rural villages with the greatest range of services and facilities, such as Ash, Capel-le-Ferne, Eastry and Eythorne. Focussing rural growth to such settlements maintains the rural economy and the necessary critical mass to connect settlements via low carbon modes of transport. Overall a mixed significant positive and minor negative effect is expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth)

C.172 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could provide residents with local employment opportunities which could reduce the need to travel for some residents and associated carbon emissions. Compared to other spatial options, this option would provide little employment development at Deal from which high levels

of commuting are noted to occur. Increasing the scale of growth in and around the allocated settlements, including Dover where it could intensify congestion issues along the A20/M20/A2 with adverse effects against this SA objective. An overall mixed significant positive and minor negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.173 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities is likely to increase, increasing carbon emissions. An overall mixed significant positive and significant negative effect is therefore expected for the highest level of growth.

Spatial Option E (more even settlement focus)

Growth Option 1 (lowest growth)

C.174 As Spatial Option E would provide a more limited proportion of overall housing development (approximately 20%) in and around Dover town it would be less likely to make best use of the existing strong employment offer and wider range of services and facilities in this area.

C.175 Deal currently provides more limited access to employment opportunities and a high number of residents at this location currently have to commute to other settlements in the plan area and surrounding local authorities for work. Providing a relatively high proportion of overall growth (approximately 30%) at this settlement is likely to reinforce these commuting patterns. This settlement provides access to a strong service offer as well as a railway station which would help to mitigate this.

C.176 Approximately 15% of the growth would be located at Aylesham. This settlement provides access to some services and facilities as well as employment sites and a railway station; however, it lacks access to some essential services including a secondary school, encouraging wider travel and the generation of carbon emissions, compared to other settlements, such as Sandwich (allocated 20% of growth), which are better serviced and help to reduce the need to travel.

C.177 The relatively high proportion of growth to be provided at the rural villages (approximately 15%) could help to

stimulate some rural employment growth and support rural service provision. However, this scale of growth is also likely to result in an increase in the number of residents who will need to travel longer distances by private car on a regular basis for work and to access services and facilities. As this option would result in a relatively dispersed distribution of growth at a wider range of rural settlements, it is less likely that the critical mass would be provided to support substantial service provision or investment in low carbon and renewable energy schemes. Overall, a mixed minor positive and significant negative effect is expected for Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth)

C.178 Growth Option 2 would provide additional employment land alongside the District's minimum housing growth needs. New employment land could help to provide residents with local employment opportunities which could reduce the need to travel for some residents and limit any associated increase in carbon emissions. This option would better help to address the issue of out-commuting from Deal considering the increased level of employment land at this settlement.

C.179 Through this option most rural villages would accommodate some new employment land to match the distribution of rural housing growth, helping to minimise travel for immediate local populations, but it is equally likely to increase extensive out-commuting to disparate rural areas. It is also noted that new employment opportunities may be limited by the more limited infrastructure at these locations. An overall mixed minor positive and significant negative effect is therefore expected for the medium level of growth.

Growth Option 3 (highest growth)

C.180 Growth Option 3 would increase the total number of homes to be provided in the plan area to 12,111, and also deliver the additional employment land. By increasing the overall number of homes in the plan area it is likely that the number of journeys being made regularly to access services and facilities and employment opportunities and the associated level of carbon emissions is likely to increase.

C.181 It is noted that relatively high levels of employment land to be provided at Deal through this option would go some way to help address the issue of out-commuting from this location. This option would also help to minimise congestion issues along the A20/M20/A2 in and around Dover town. An overall mixed minor positive and significant negative effect is therefore expected for the highest level of growth.

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	--	--	--	--	--
Key					
--					
Significant negative effect likely					

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.182 Spatial Option A would focus growth to the suitable housing sites identified through the District's HELAA. The vast majority of these are located within and around Dover (76%). Dover is generally less constrained by ecological designations than other parts of the District, notably in the north east near Deal and Sandwich, although it does lie in close proximity to several ecological assets in the surrounding uplands and to the north, such as the Lydden and Temple Ewell Downs SSSI and SAC. The development of all suitable site opportunities in the town, several of which are in close proximity to ecological assets, is likely to result in some direct adverse effect on the District's biodiversity.

C.183 The location of relatively few suitable sites in Deal, which would receive 5% of the growth, and Sandwich, which would receive 2%, would limit the potential for direct adverse effects on the ecological assets in their immediate vicinity.

C.184 17% of the capacity of the suitable sites is located in the District's rural villages. The District's rural settlements are generally unconstrained by strategic ecological assets, but there are a few notable exceptions: Lydden adjacent to the Lydden and Temple Ewell Downs SSSI and SAC; Ash, Preston and Wingham in the catchment of the Stour and the designated Stodmarsh SSSI, SAC, SPA and Ramsar in neighbouring Canterbury, known to be sensitive to excessing nutrients from waste water discharges; and St Margaret's adjacent to the Dover to Kingsdown Cliffs SSSI and SAC. Each of these more sensitive rural settlements is assigned roughly 1% of the District's growth under this option.

C.185 In addition to the potential for the scale and distribution of growth to result in the direct loss of protected ecological habitats and species, the overall scale of growth required under this option has the potential to significantly increase the number of people living and working in the District. This has the potential to significantly increase recreational impacts on several of the District's natural assets, some of which are known to be sensitive to recreational impacts. Therefore, a significant negative effect is expected for Spatial Option A (suitable sites) under the lowest growth scenario; however, there is greater opportunity to avoid the majority of these significant adverse effects in the south western half of the District, therefore this effect is recorded as more uncertain.

Growth Option 2 (medium growth)

C.186 Growth Option 2 would introduce additional employment land within and in close proximity to Dover, Eastry, Ringwould and Sandwich, but this would not notably change the uncertain significant negative effect recorded against the lowest growth scenario.

Growth Option 3 (highest growth)

C.187 Growth Options 3 would increase the scale of growth at the majority of the settlements listed above under the lowest growth scenario. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 9. However, it should be noted that a significant portion of the potentially suitable sites are located in less sensitive parts of the District, such as in and around Aylesham. Overall, the general increase in the scale of growth under the highest growth scenario is likely to remove

any uncertainty of at least some significant adverse effects on the area's sensitive ecological assets.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.188 Delivering growth in line with existing settlements' size through Spatial Option B would result in Dover town (approximately 39%) and Deal (approximately 28%) accommodating high levels of development, followed by roughly 4% in Sandwich and Aylesham. Dover is generally less constrained by ecological designations than other parts of the District, notably in the north east near Deal and Sandwich. Although it does lie in close proximity to several ecological assets in the surrounding uplands and to the north, this scale of growth could be accommodated without resulting in their physical loss or fragmentation. Similarly, in Deal and Sandwich, accommodating growth to the south of the settlement would avoid loss and fragmentation of the assets to the north and east.

C.189 However, distributing growth proportionately across all notable settlements would allocate roughly 26% of growth to the District's smaller rural settlements. The District's rural settlements are generally unconstrained by strategic ecological assets, but there are a few notable exceptions: Lydden adjacent to the Lydden and Temple Ewell Downs SSSI and SAC; Ash, Preston and Wingham in the catchment of the Stour and the designated Stodmarsh SSSI, SAC, SPA and Ramsar in neighbouring Canterbury, known to be sensitive to excessing nutrients from waste water discharges; and St Margaret's adjacent to the Dover to Kingsdown Cliffs SSSI and SAC. Some of these sensitive rural settlements would receive notable allocations of growth: Ash (3%), St Margaret's and Wingham (2%).

C.190 In addition to the potential for the scale and distribution of growth to result in the direct loss of protected ecological habitats and species, the overall scale of growth required under this option has the potential to significantly increase the number of people living and working in the District. This has the potential to significantly increase recreational impacts on several of the District's natural assets, some of which are known to be sensitive to recreational impacts. Therefore, a significant negative effect is expected for the lowest growth scenario under Spatial Option B (population based).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.191 Growth Options 2 and 3 would increase the scale growth across all notable settlements, including those in closest proximity to the area's most significant and sensitive

ecological assets. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 9. Therefore, a significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option C (settlement hierarchy)

Growth Option 1 (lowest growth)

C.192 Delivering growth in line with District's settlement hierarchy, focussing development in and around the settlements with the greatest concentration of services and facilities would result in growth being focussed in and around Dover (45%), Deal (20%), Sandwich (15%) and Aylesham (10%). Allocating roughly 10% of the District's growth to Aylesham would likely not have a significant effect on the District's ecological assets. The allocation of 10% of the growth to many of the other, smaller rural villages, some of which lie in close proximity to significant and sensitive ecological assets, may do. However, the relatively small scale of growth amongst the District's smaller rural settlements, all of which would receive less than 1% of the District's growth, suggests there would be greater opportunity to avoid adverse effects under this option.

C.193 Dover is generally less constrained by ecological designations than other parts of the District, notably in the north east near Deal and Sandwich. Although it does lie in close proximity to several ecological assets in the surrounding uplands and to the north, this scale of growth could be accommodated without resulting in their physical loss or fragmentation. Similarly, in Deal and Sandwich, accommodating growth to the south of the settlement would avoid loss and fragmentation of the assets to the north and east.

C.194 In addition to the potential for the scale and distribution of growth to result in the direct loss of protected ecological habitats and species, the overall scale of growth required under this option has the potential to significantly increase the number of people living and working in the District. This has the potential to significantly increase recreational impacts on several of the District's natural assets, some of which are known to be sensitive to recreational impacts. Allocating 35% of the District's growth needs in Sandwich and Deal has the potential to particularly affect the Thanet Coast and Sandwich Bay Ramsar site and SPA as well as Sandwich Bay SAC. Therefore, a significant negative effect is expected for the lowest growth scenario under Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.195 Growth Options 2 and 3 would increase the scale of growth across all notable settlements, including those in closest proximity to the area's most significant and sensitive ecological assets. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 9. Therefore, a significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.196 Adopting the same spatial strategy as the current Local Plan would see the vast majority of growth being directed towards Dover (roughly 70%), particularly north Dover around Whitfield. Dover is generally less constrained by ecological designations than other parts of the District, although it does lie in close proximity to several ecological assets in the surrounding uplands and to the north. Development at this scale in and around Dover town is unlikely to not result in some adverse effects on its surrounding ecological assets.

C.197 Growth in the more sensitive north eastern part of the District in Deal and Sandwich would be limited to 10% and 5% of growth, respectively.

C.198 Spatial Option D (adopted Plan Dover focus) would limit the amount of development to be provided at the more rural villages to approximately 8%. Development at the rural settlements would only occur at the better serviced settlements. Only Ash, linked to the sensitive Stodmarsh in neighbouring Canterbury would receive a notable scale of growth under this option (2%).

C.199 In addition to the potential for the scale and distribution of growth to result in the direct loss of protected ecological habitats and species, the overall scale of growth required under this option has the potential to significantly increase the number of people living and working in the District. This has the potential to significantly increase recreational impacts on several of the District's natural assets, some of which are known to be sensitive to recreational impacts. Therefore, a significant negative effect is expected for Spatial Option D (adopted Plan Dover focus) under the lowest growth scenario; however, there is greater opportunity to avoid the majority of these significant adverse effects in the south western half of the District, therefore this effect is recorded as more uncertain.

Growth Option 2 (medium growth)

C.200 Growth Option 2 would introduce additional employment land across the settlements, particularly in and

around Dover town, although this would not be significant enough to notably change the significance of the effect recorded under the lowest growth scenario for this spatial option.

Growth Option 3 (highest growth)

C.201 Growth Options 3 would increase the scale of growth at the majority of the settlements listed above under the lowest growth scenario. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 9. Overall, the general increase in the scale of growth under the highest growth scenario is likely to remove any uncertainty of at least some significant adverse effects on the area's sensitive ecological assets.

Spatial Option E (more even settlement focus)**Growth Option 1 (lowest growth)**

C.202 Spatial Option E redistributes a significant amount of growth away from Dover (which receives 20%) to the smaller urban areas of Deal (30%), Sandwich (20%) and Aylesham (15%), with the remaining 15% of growth being distributed amongst the District's rural settlements.

C.203 Deal and Sandwich are considerably more constrained by the significant and sensitive ecological assets to the north and east, compared to Dover.

C.204 The District's rural settlements are generally unconstrained by strategic ecological assets, but there are a few notable exceptions: Lydden adjacent to the Lydden and Temple Ewell Downs SSSI and SAC; Ash, Preston and Wingham in the catchment of the Stour and the designated Stodmarsh SSSI, SAC, SPA and Ramsar in neighbouring Canterbury, known to be sensitive to excessing nutrients from waste water discharges; and St Margaret's adjacent to the Dover to Kingsdown Cliffs SSSI and SAC. Some of these sensitive rural settlements would receive notable allocations of growth, specifically Ash, St Margaret's and Wingham – all of which would receive over 1% of the District's total growth each.

C.205 In addition to the potential for the scale and distribution of growth to result in the direct loss of protected ecological habitats and species, the overall scale of growth required under this option has the potential to significantly increase the number of people living and working in the District. This has the potential to significantly increase recreational impacts on several of the District's natural assets, some of which are known to be sensitive to recreational impacts. Allocating 50% of the District's growth needs in Sandwich and Deal has the potential to particularly affect the Thanet Coast and Sandwich Bay Ramsar site and SPA as well as Sandwich Bay SAC.

Therefore, a significant negative effect is expected for the lowest growth scenario under Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.206 Growth Options 2 and 3 would increase the scale of growth across all notable settlements, particularly those in

closest proximity to the area's most significant and sensitive ecological assets (Deal and Sandwich). This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 9. Therefore, a significant negative effect is also expected for the medium and highest growth scenarios.

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	--?	--?	--?	--?	--?
Key					
--					
Significant negative effect likely					

Spatial Option A (suitable sites)

Growth Option 1 (lowest growth)

C.207 Spatial Option A would focus growth to the suitable housing sites identified through the District's HELAA. The vast majority of these are located within and around Dover (76%). Despite being the District's most historic settlement it's scale and areas of more modern development offer considerable scope to growth without adversely affecting its special character; however, the development of all site opportunities in the historic core of the town, several of which are in close proximity to historic assets is likely to result in some adverse effect to the town's overall historic significance, and potentially the significance of assets within and in its immediate vicinity. The location of relatively few suitable sites in the other historic towns in the District, notably Deal which would receive 5% of the growth and Sandwich which would receive 2% would limit the adverse effects in these settlements. However, 17% of the capacity of the suitable sites is located in the District's rural villages, several of which are historic, such as Eythorne, Eastry, Northbourne, St Margaret's, Ash, Alkham, Preston and Wingham. Therefore,

an uncertain significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.208 Growth Option 2 would introduce additional employment land within and in close proximity to historic Dover, Eastry, Ringwould and Sandwich. Growth Options 3 would increase the scale of growth at the majority of the settlements listed above under the lowest growth scenario. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 10. However, it should be noted that a significant portion of the potentially suitable sites are located in less historic parts of the District, such as in and around Aylesham. Again, Eastry is a notable exception.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.209 Delivering growth in line with existing settlements' size through Spatial Option B would result in Dover town

(approximately 39%) and Deal (approximately 28%) accommodating high levels of development. While both settlements contain significant concentrations of historic assets, they are largely concentrated along the seafront and central routeways through the settlements. There are therefore opportunities to deliver development without affecting the setting and special character of these settlements. Furthermore, allocating roughly 4% of the District's growth to Aylesham would likely not have a significant effect on the District's historic environment.

C.210 However, distributing growth proportionately across all notable settlements would result in the potential of some adverse effects associated with the densification and urbanisation of the District, particularly in rural settlements, which would share roughly 26% of the growth under this option. The smaller settlements often have more intact and open historic cores making them more vulnerable to significant increases in growth. Notably historic villages at risk from the growth distributed under this lower growth scenario include Eythorne, Eastry, Northbourne, St Margaret's, Ash, Alkham, Preston and Wingham. Therefore, an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option B (population based).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.211 Growth Options 2 and 3 would increase the scale growth across all notable settlements, including the most historic settlements and those most sensitive to change. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 10. Therefore, an uncertain significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option C (settlement hierarchy)

Growth Option 1 (lowest growth)

C.212 Delivering growth in line with District's settlement hierarchy, focussing development in and around the settlements with the greatest concentration of services and facilities would result in growth being focussed in and around Dover (45%), Deal (20%), Sandwich (15%) and Aylesham (10%). Although allocating roughly 10% of the District's growth to Aylesham would likely not have a significant effect on the District's historic environment, the allocation of 10% of the growth to many of the other, smaller rural villages would.

C.213 While Dover, Deal and Sandwich contain significant concentrations of historic assets, they are largely concentrated

along the seafront and central routeways through the settlements. There are therefore opportunities to deliver development without affecting the setting and special character of these settlements. However, distributing growth across the smaller settlements, many of which are historic and more vulnerable to the significant urbanising effects of increases in growth would likely result in some significant adverse effects on the District's historic environment. Particularly sensitive settlements include Eythorne, Eastry, Northbourne, St Margaret's, Ash, Alkham, Preston and Wingham. Therefore, an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.214 Growth Options 2 and 3 would increase the scale growth across all notable settlements, including the most historic settlements and those most sensitive to change. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 10. Therefore, an uncertain significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option D (adopted plan Dover focus)

Growth Option 1 (lowest growth)

C.215 Adopting the same spatial strategy as the current Local Plan would see the vast majority of growth being directed towards Dover (roughly 70%), particularly north Dover around Whitfield. Despite being the District's most historic settlement, it is also the largest, with significant areas of more modern development. The town is therefore more resilient to change than some of the District's smaller, more rural settlements.

C.216 Spatial Option D (adopted Plan Dover focus) would limit the amount of development to be provided at the more rural villages to approximately 8%. Development at the rural settlements would only occur more towards the well serviced settlements which are more likely to be able to accommodate some growth without significant adverse impacts on their existing character. However, some of the larger villages are also some of the most historic, such as Ash and Eastry, both of which would receive the greatest scales of growth amongst the smaller villages under this option. Therefore, although option is likely to generate the least extensive and significant adverse effects against SA objective 10, overall, an uncertain significant negative effect is still recorded under the lowest growth scenario.

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.217 Growth Options 2 and 3 would increase the scale of growth in and around Dover town, Deal, Sandwich and Aylesham. Under the highest growth scenario (Growth Option 3), Dover would receive roughly an additional 2,400 dwellings resulting in a total of over 8,450. It is highly unlikely that this scale of development could be delivered without affecting the setting and special character of some historic assets in and around the settlement. Furthermore, the scale of growth would also increase in some of the historic rural settlements, including Ash and Eastry, increasing the significance and likelihood of the significant negative effects recorded against SA objective 10. Therefore, an uncertain significant negative effect is recorded for the medium and highest growth scenarios under Spatial Option D (adopted Plan Dover focus).

Spatial Option E (more even settlement focus)**Growth Option 1 (lowest growth)**

C.218 Spatial Option E redistributes a significant amount of growth away from Dover (which receives 20%) to the smaller

urban areas of Deal (30%), Sandwich (20%) and Aylesham (15%), with the remaining 15% of growth being distributed amongst the District's rural settlements. The scale of distributed growth across the rural settlements would result in their densification and urbanisation. This would likely have adverse effects on the historic character of the more historic villages in the District, such as Eythorne, Eastry, Northbourne, St Margaret's, Ash, Alkham, Preston and Wingham. Therefore, an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.219 Growth Options 2 and 3 would increase the scale of growth across all notable settlements, including the most historic settlements and those most sensitive to change. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 10. Therefore, an uncertain significant negative effect is also expected for the medium and highest growth scenarios.

SA11: 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	--?	--?	--?	--?	--?
Key					
-- Significant negative effect likely			- Minor negative effect likely		

Spatial Option A (suitable sites)**Growth Option 1 (lowest growth)**

C.220 Delivering Spatial Option would result in the vast majority of growth (approximately 76%) being delivered in and around Dover town. Despite being in close proximity to the

AONB to the east and west, the land to the north and north east of the town falls outside the designations. However, the vast majority of the suitable HELAA sites identified are not located here. Sites in Dover town could affect Dover's townscape character through the densification of its urban area.

C.221 A more limited amount of the overall housing development would be provided at the settlements of Deal (5%) and Sandwich (2%) under this option. This option would, however, include a relatively high proportion (17%) of housing growth at the more rural settlements. Impacts on existing rural character are therefore particularly likely to occur across a number of areas which are currently more undeveloped. Included several sites in the small settlements within and directly adjacent to the AONB and/or heritage coast: Alkham, Capel-le-Ferne, Ringwould, St Margaret's, Lydden and West Hougham. The cumulative effect of this scale of growth in close proximity to these designations, not to mention the significant densification of other rural places in the District, has the potential to result in significant adverse impacts on this SA objective. Overall an uncertain significant negative effect is expected for Spatial Option A (suitable sites).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.222 Growth Options 2 and 3 would increase the scale of growth in Dover town, Deal, Sandwich, Aylesham and the rural villages, including those within and in close proximity to the AONB and heritage coast. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 11. However, the vast majority of the additional growth within the potentially suitable sites identified through the HELAA are located a significant distance from the sensitive landscape designations. Kingsdown is a notable exception receiving an additional 100 dwellings under the highest growth scenario. Therefore, these significant negative effects are still recorded as uncertain in acknowledgement of the potential for them to be avoided.

Spatial Option B (population based)

Growth Option 1 (lowest growth)

C.223 Delivering growth in line with existing settlements' size through Spatial Option B would result in Dover town (approximately 39%) and Deal (approximately 28%) accommodating high levels of development. While the AONB and heritage coast are located in close proximity to Dover, it is expected that there may be opportunities to deliver development at this northern and eastern boundaries of Dover and south of Deal without significantly affecting the setting of these designations.

C.224 However, distributing growth proportionately across all notable settlements would result in the potential of some adverse effects associated with the densification and urbanisation of the District, particularly in rural settlements, which would share roughly 26% of the growth under this option. The smaller settlements within and adjacent to the

AONB and/or heritage coast would receive increases in growth, notably St Margaret's, Kingsdown, Ringwould and Capel-le-Ferne inset within the AONB and Alkham, Denton with Wooton and West Hougham washed over by it.

C.225 Considering the potential for impacts on existing rural character as well as the settings of both the AONB and Heritage Coast an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option B (population based).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.226 Growth Options 2 and 3 would increase the scale growth across all notable settlements, including those within and in close proximity to the AONB and/or heritage coast. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 11. Therefore, an uncertain significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option C (Settlement Hierarchy)

Growth Option 1 (lowest growth)

C.227 Delivering growth in line with District's settlement hierarchy, focussing development in and around the settlements with the greatest concentration of services and facilities would result in growth being focussed in and around Dover (45%), Deal (20%), Sandwich (15%) and Aylesham (10%). 10% of the growth would also be distributed amongst the District's better serviced rural villages. While the AONB and heritage coast are located in close proximity to Dover, the land to the north and east of the town is located outside of the designations offering scope to avoid significant adverse effects.

C.228 Several of the rural settlements within and in close proximity of the designations (St Margaret's, Kingsdown, Ringwould, Capel-le-Ferne, Alkham, Denton with Wooton and West Hougham) would still receive some growth, which would have the potential to compromise their setting and special character.

C.229 Considering the potential for impacts on existing rural character as well as the settings of both the AONB and Heritage Coast an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option C (settlement hierarchy).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.230 Growth Options 2 and 3 would increase the scale of growth across the majority of settlements, including those within and in close proximity to the AONB and/or heritage coast. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 11. Therefore, an uncertain significant negative effect is also expected for the medium and highest growth scenarios.

Spatial Option D (adopted plan Dover focus)**Growth Option 1 (lowest growth)**

C.231 Adopting the same spatial strategy as the current Local Plan would see the vast majority of growth being directed towards Dover (roughly 70%), particularly north Dover around Whitfield. 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. Growth in these locations (to the north and east) could minimise harm on the setting and special character of the designations.

C.232 Spatial Option D (adopted Plan Dover focus) would limit the amount of development to be provided at the more rural villages to approximately 8%. Development at the rural settlements would only occur more towards the well serviced settlements which are more likely to be able to accommodate some growth without significant adverse impacts on their existing character. It is noted that this option would include some housing growth at the potentially sensitive settlements of Capel-le-Ferne, Lydden, Kingsdown and St Margaret's; however, its scale would likely be relatively insignificant at the lowest growth scenario. Overall an uncertain minor negative effect is expected for Spatial Option D (adopted Plan Dover focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.233 Growth Options 2 and 3 would increase the scale of growth in and around Dover town and surrounding settlements of Capel-le-Ferne, Lydden, Kingsdown and St Margaret's in close proximity to the AONB and/or heritage coast. There would be a general increase in the density and urban character of these settlements. This is likely to increase the significance and likelihood of adverse effects recorded against SA objective 7; however, the rural settlements would not receive significantly more growth under the medium and highest growth scenarios.

C.234 The allocation of additional employment land under the medium growth scenario would not significantly increase the scale of growth, relative to the existing size of Dover in particular. Therefore, an uncertain minor negative effect is also expected for the medium growth scenario for Spatial Option D (adopted Plan Dover focus).

C.235 However, under the highest growth scenario, Dover, would receive roughly an additional 2,400 dwellings resulting in a total of over 8,450. It is highly unlikely that this scale of development could be delivered without affecting the setting and special character of either Dover itself or the surrounding AONB. Therefore, an uncertain significant negative effect is recorded for the highest growth scenario Spatial Option D (adopted Plan Dover focus).

Spatial Option E (more even settlement focus)**Growth Option 1 (lowest growth)**

C.236 Spatial Option E redistributes a significant amount of growth away from Dover (which receives 20%) to the smaller urban areas of Deal (30%), Sandwich (20%) and Aylesham (15%), with the remaining 15% of growth being distributed amongst the District's rural settlements. While the AONB and heritage coast are located some distance away from Deal, Sandwich and Aylesham and it is expected that there may be opportunities to deliver development to the north and east of Dover outside the setting of the designations, this scale of distributed growth across the rural settlements would result in their densification and urbanisation. This includes the settlements within and adjacent to the AONB and/or heritage coast would receive increases in growth, notably St Margaret's, Kingsdown, Ringwould and Capel-le-Ferne inset within the AONB and Alkham, Denton with Wooton and West Hougham washed over by it.

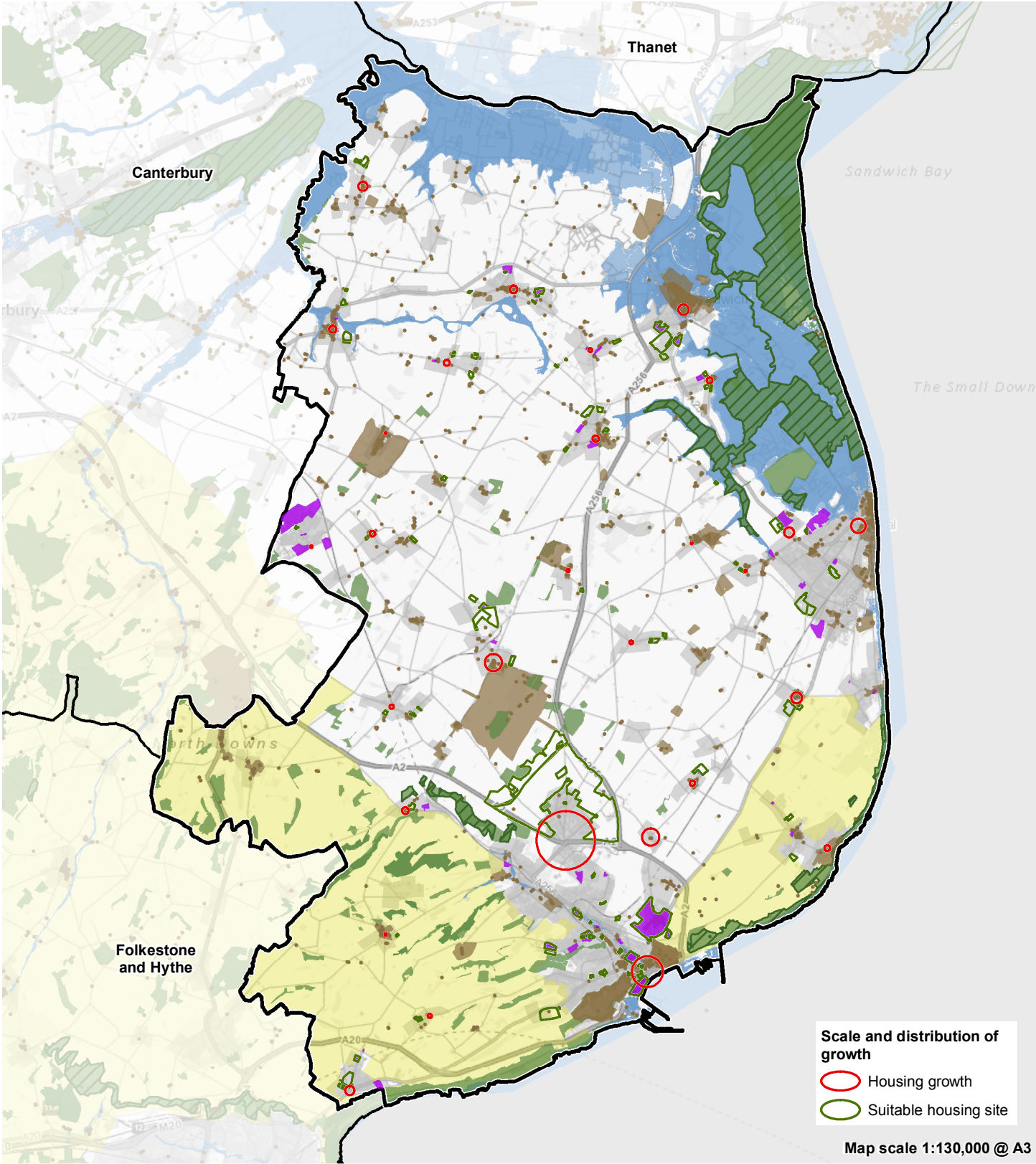
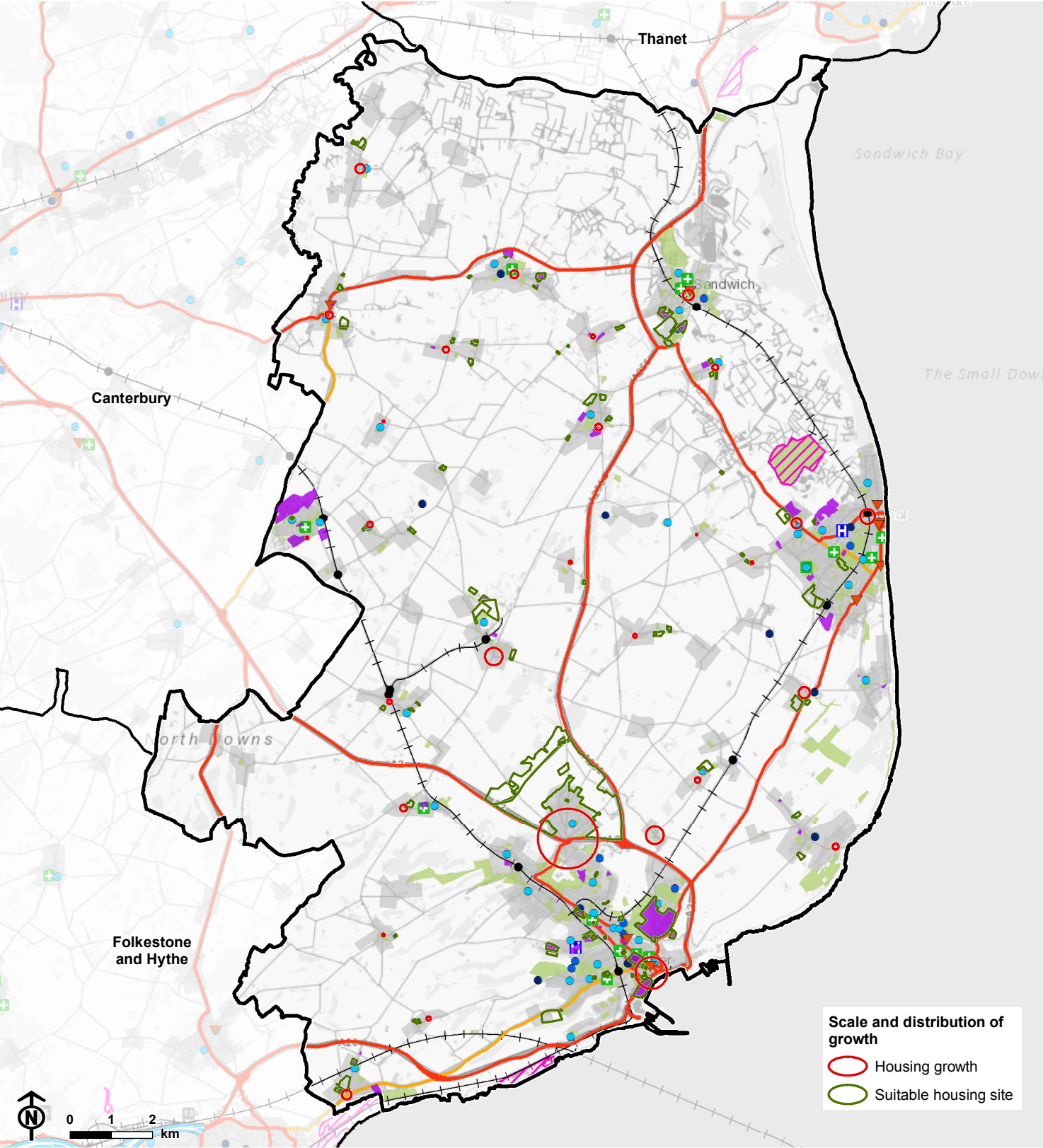
C.237 Considering the potential for impacts on existing rural character as well as the settings of both the AONB and Heritage Coast an uncertain significant negative effect is expected for the lowest growth scenario under Spatial Option E (more even settlement focus).

Growth Option 2 (medium growth) and Growth Option 3 (highest growth)

C.238 Growth Options 2 and 3 would increase the scale growth across the same settlements noted under the lowest growth scenario, including those within and in close proximity to the AONB and/or heritage coast. There would be a general increase in the density and urban character of most settlements. This is likely to increase the significance and likelihood of the significant negative effects recorded against SA objective 11. Therefore, an uncertain significant negative

effect is also expected for the medium and highest growth scenarios.

Figure C.1: Spatial Option A (Suitable Sites) / Growth Option 1 (Lowest Growth)



Strategic Transport Infrastructure, Services and Facilities

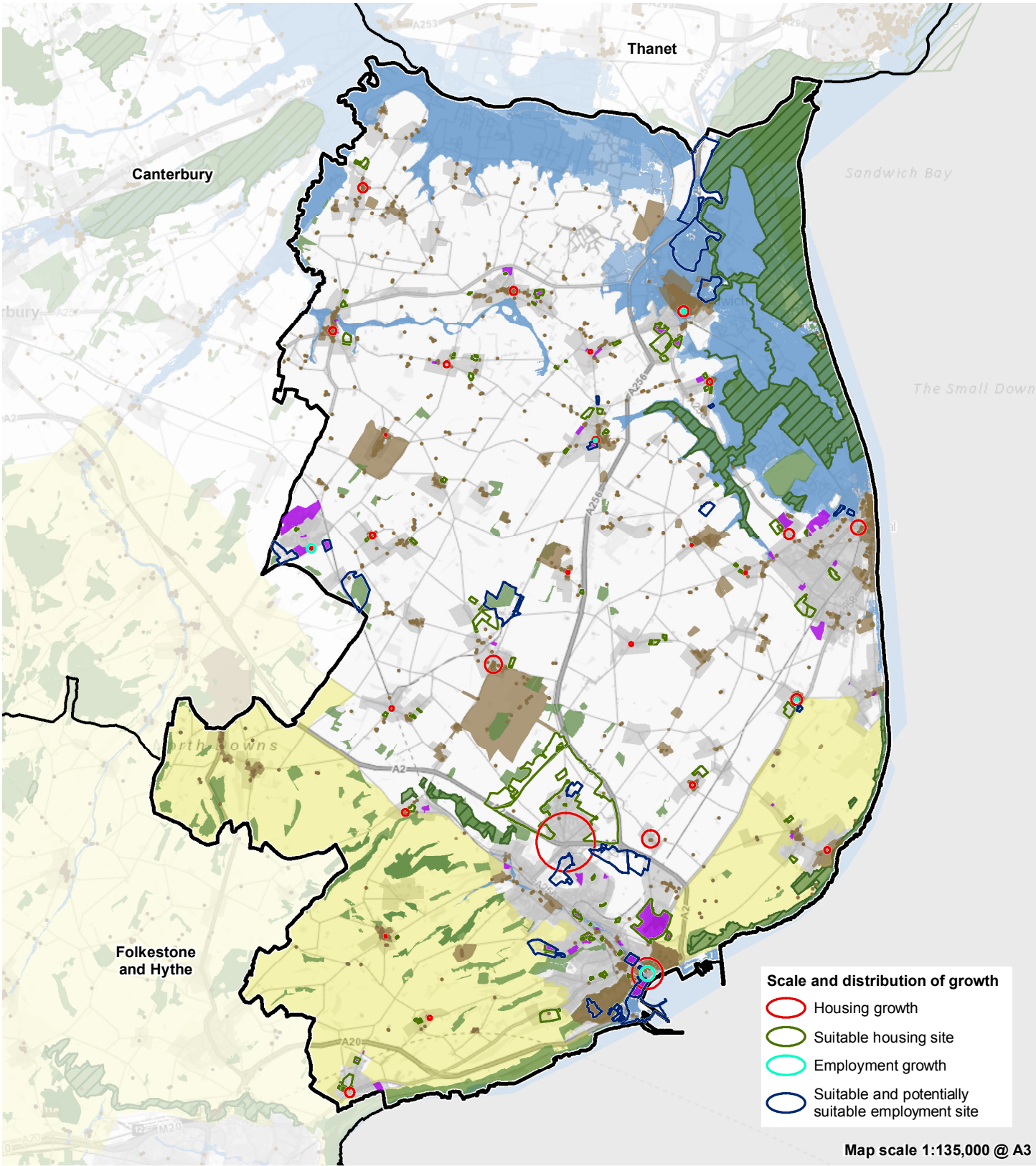
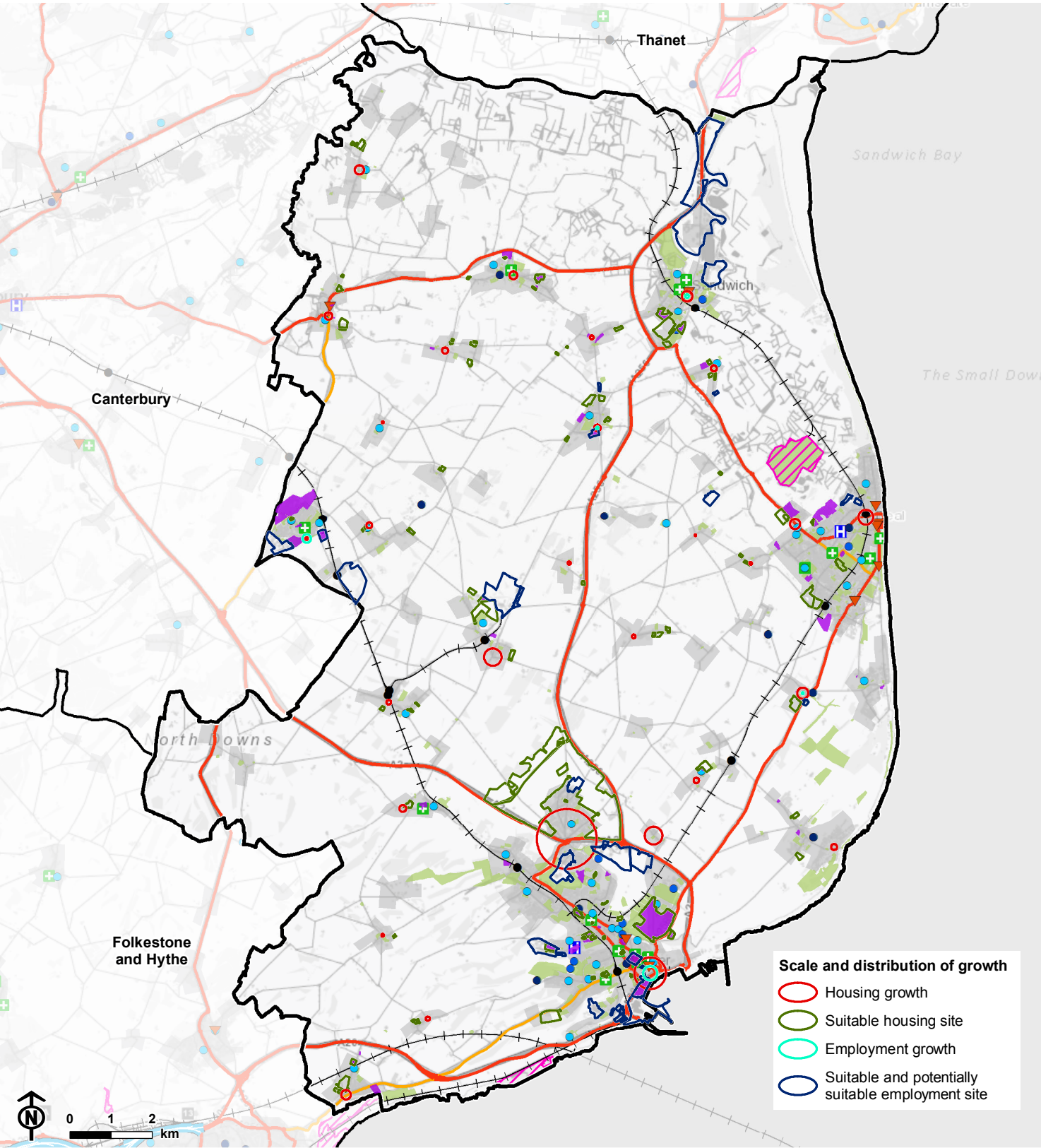
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.2: Spatial Option A (Suitable Sites) / Growth Option 2 (Medium Growth)



Strategic Transport Infrastructure, Services and Facilities

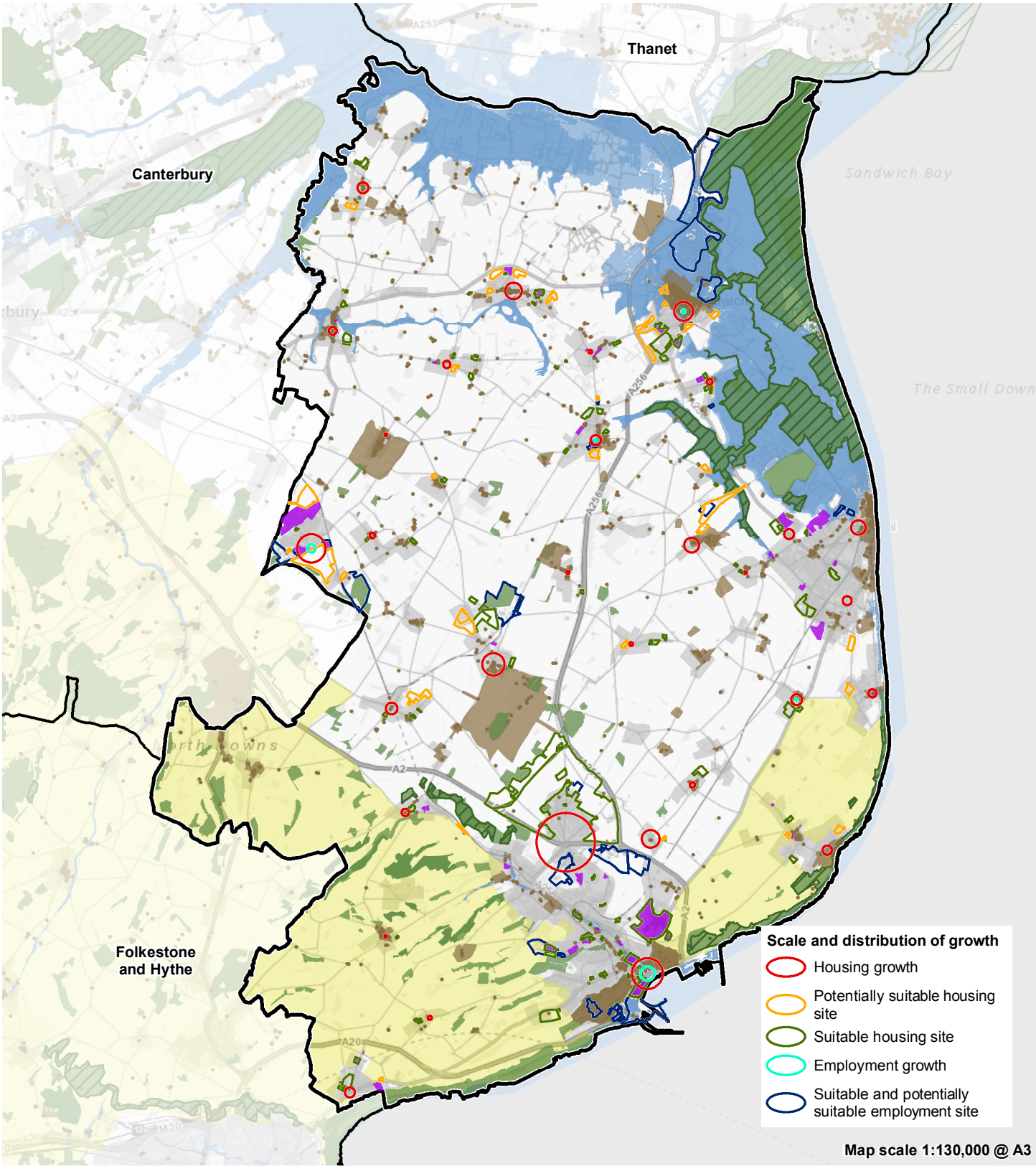
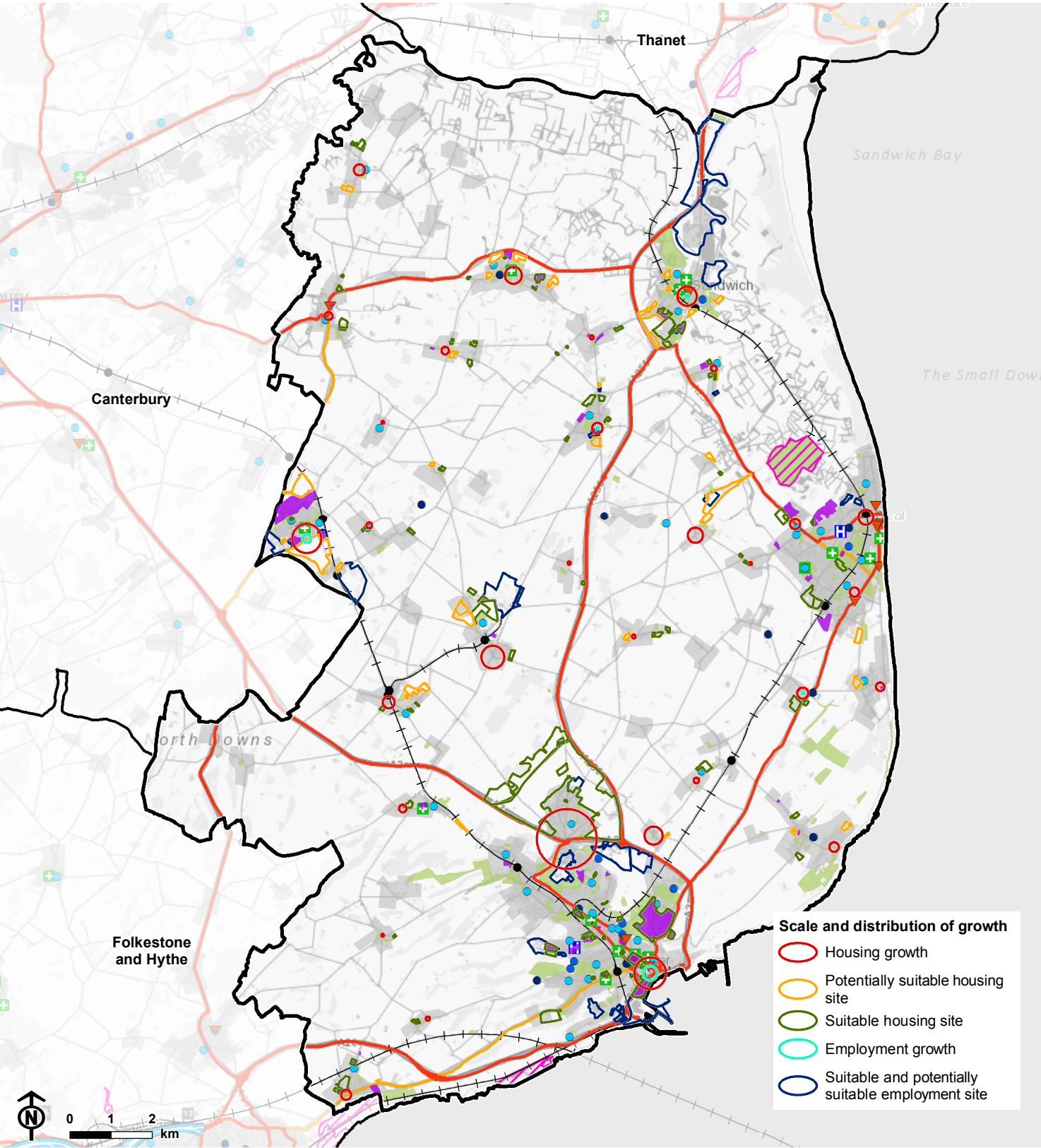
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.3: Spatial Option A (Suitable Sites) / Growth Option 3 (Highest Growth)



CB:KC EB:Bean_C LUC FIGC_3_10043_A3L_27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

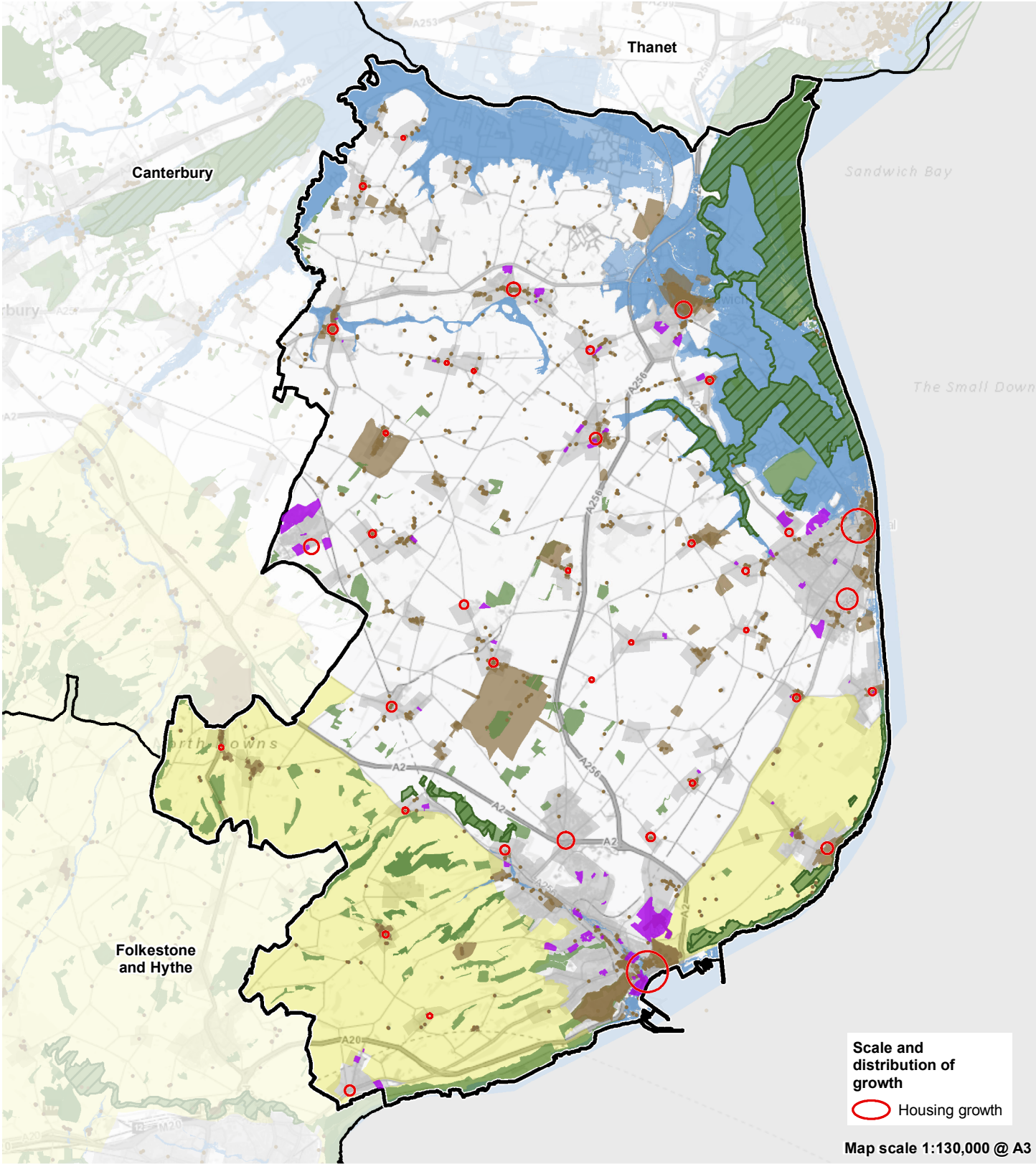
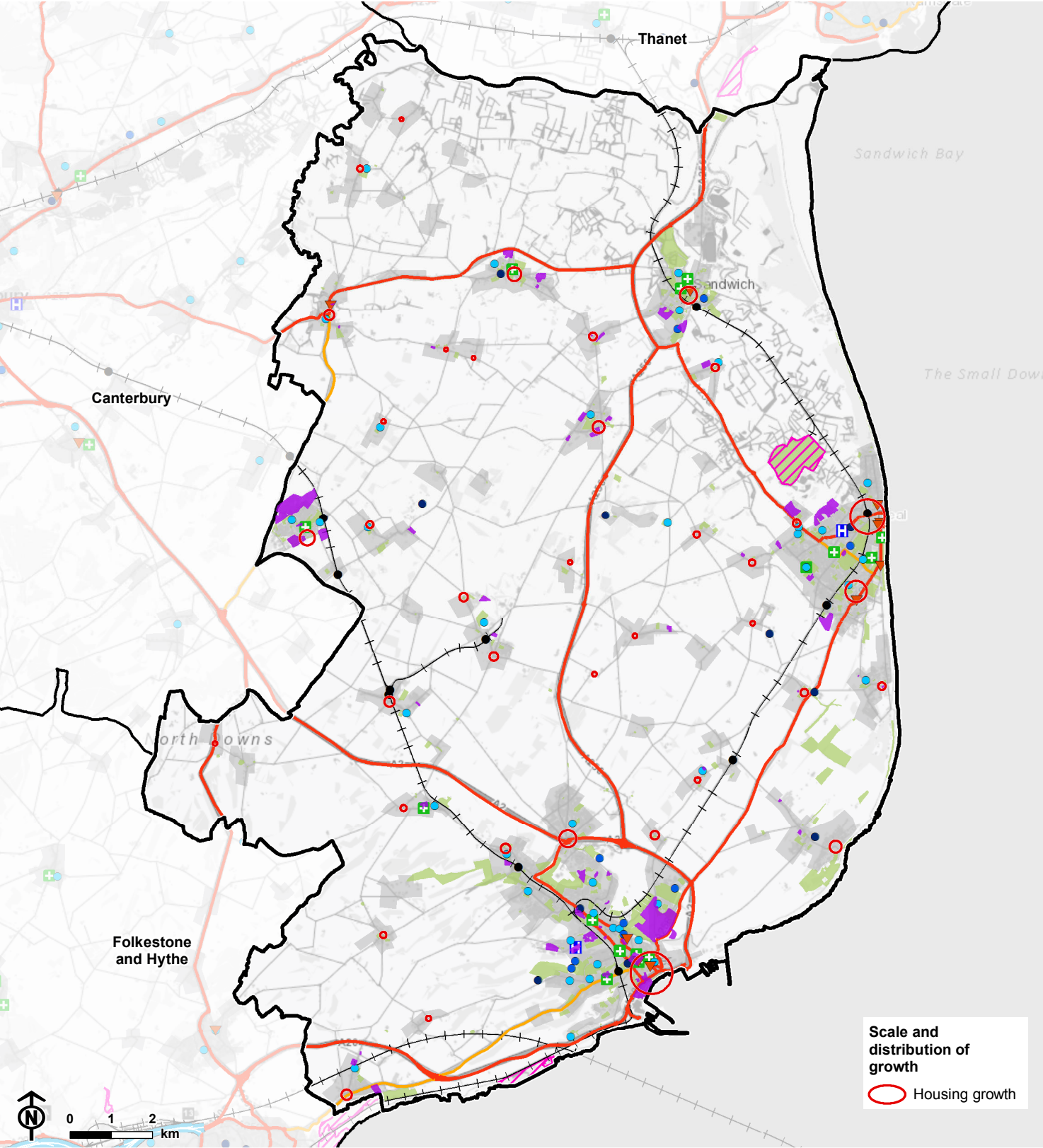
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.4: Spatial Option B (Population Based) / Growth Option 1 (Lowest Growth)



CB:KC EB:Bean_C LUC FIGC_4_10043_A3L 27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

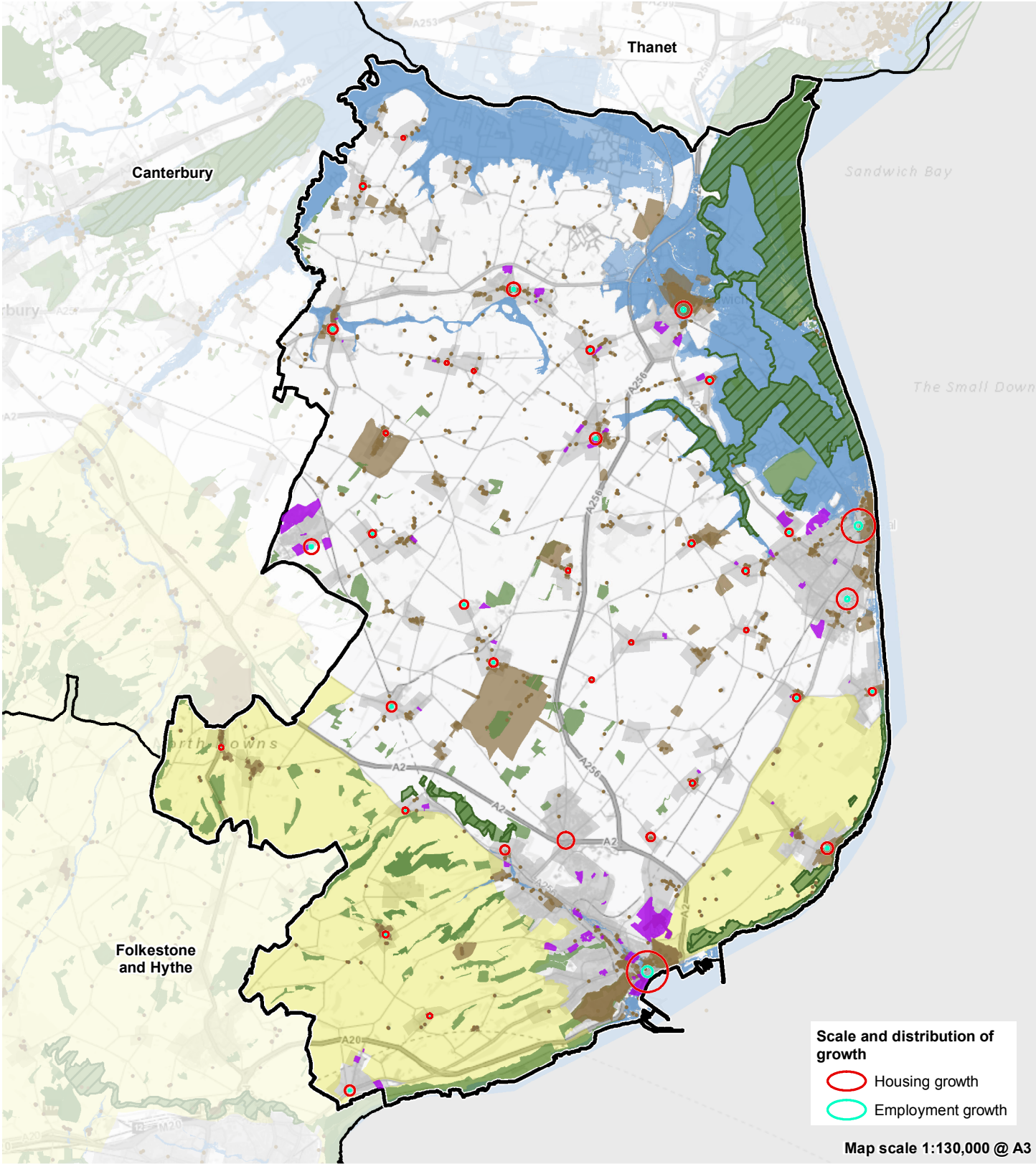
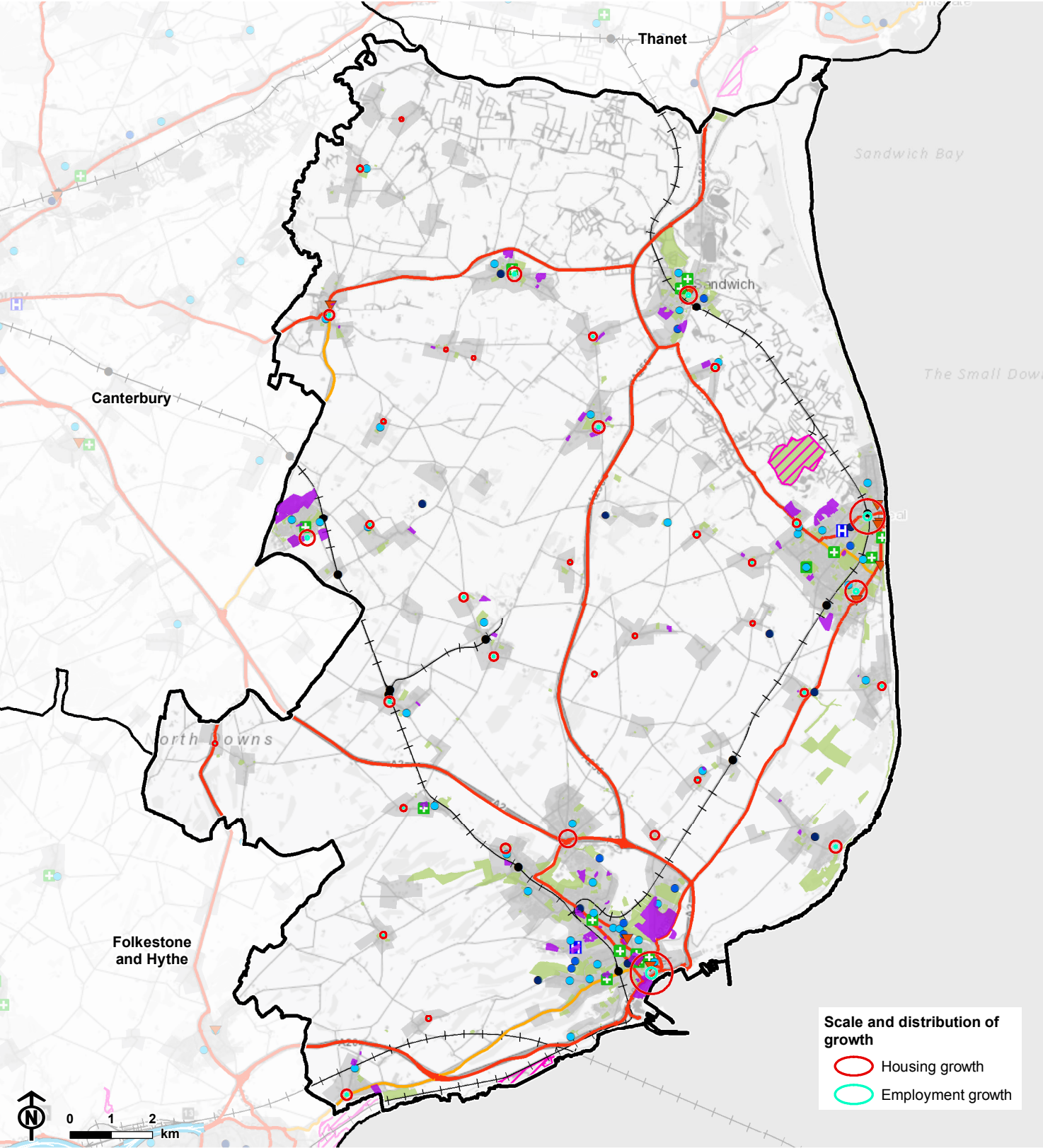
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.5: Spatial Option B (Population Based) / Growth Option 2 (Medium Growth)



Strategic Transport Infrastructure, Services and Facilities

- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Scale and distribution of growth

- Housing growth
- Employment growth



District boundary

Education

- Primary
- Secondary
- Higher / further

Health and wellbeing

- GP practice
- Dentist
- Hospital
- Open space
- Country park

Transport network

- Motorway
- A road
- B road
- Railway station
- Railway track

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

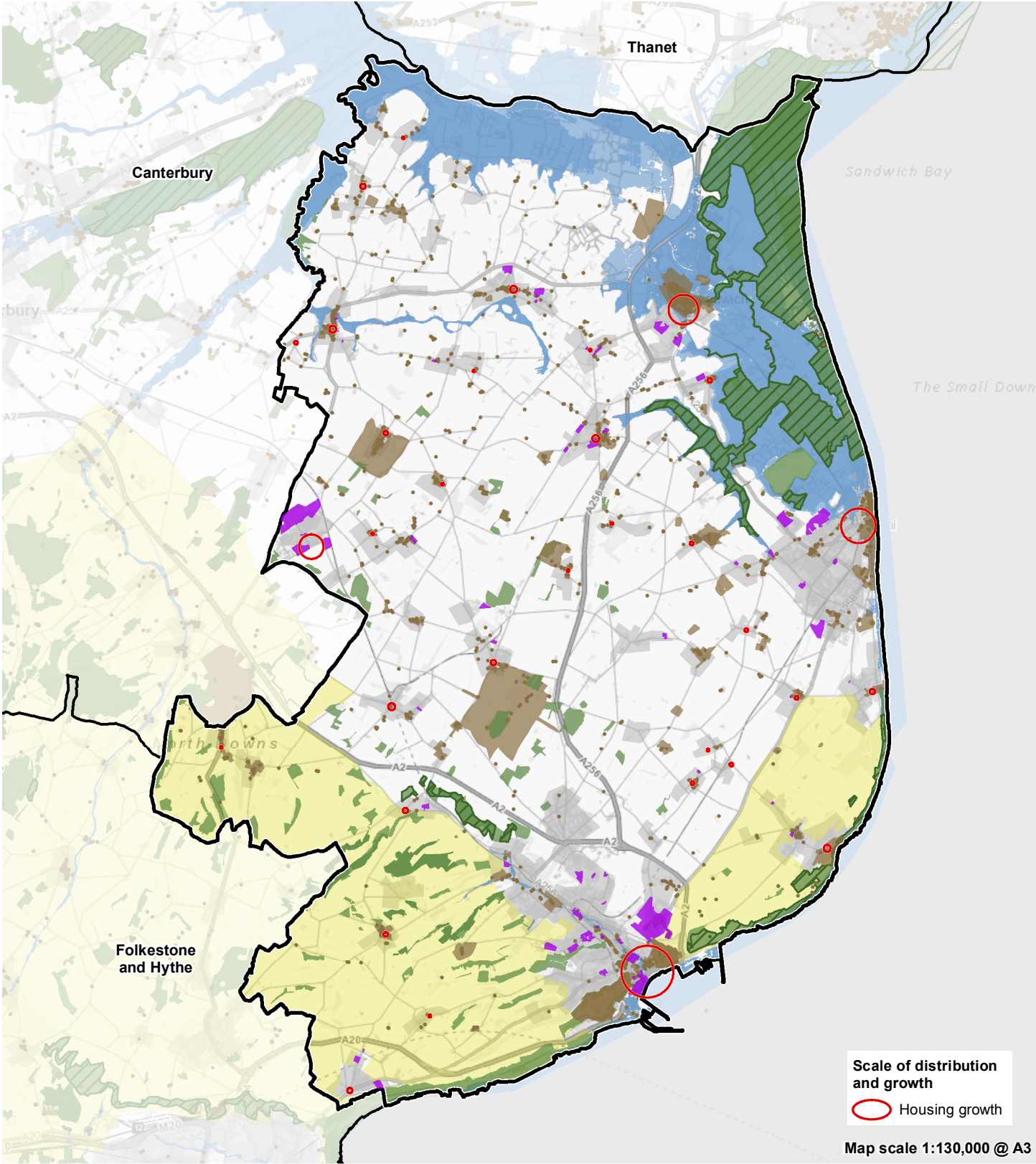
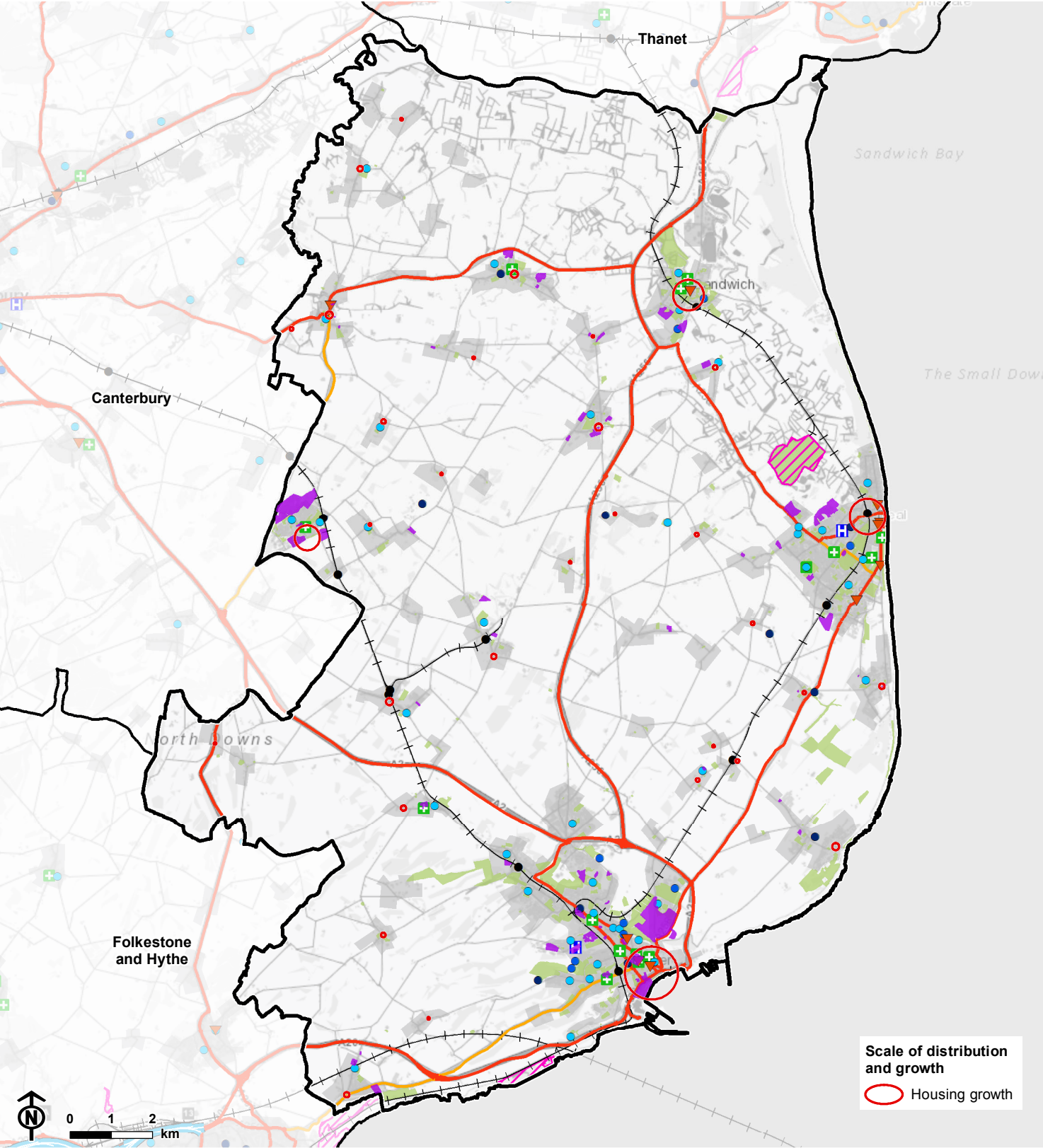
Historic environment constraint
Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.

Blue shade appears darker where zone 2 and 3 overlap.

Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.

Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.7: Spatial Option C (Settlement Hierarchy) / Growth Option 1 (Lowest Growth)



Strategic Transport Infrastructure, Services and Facilities

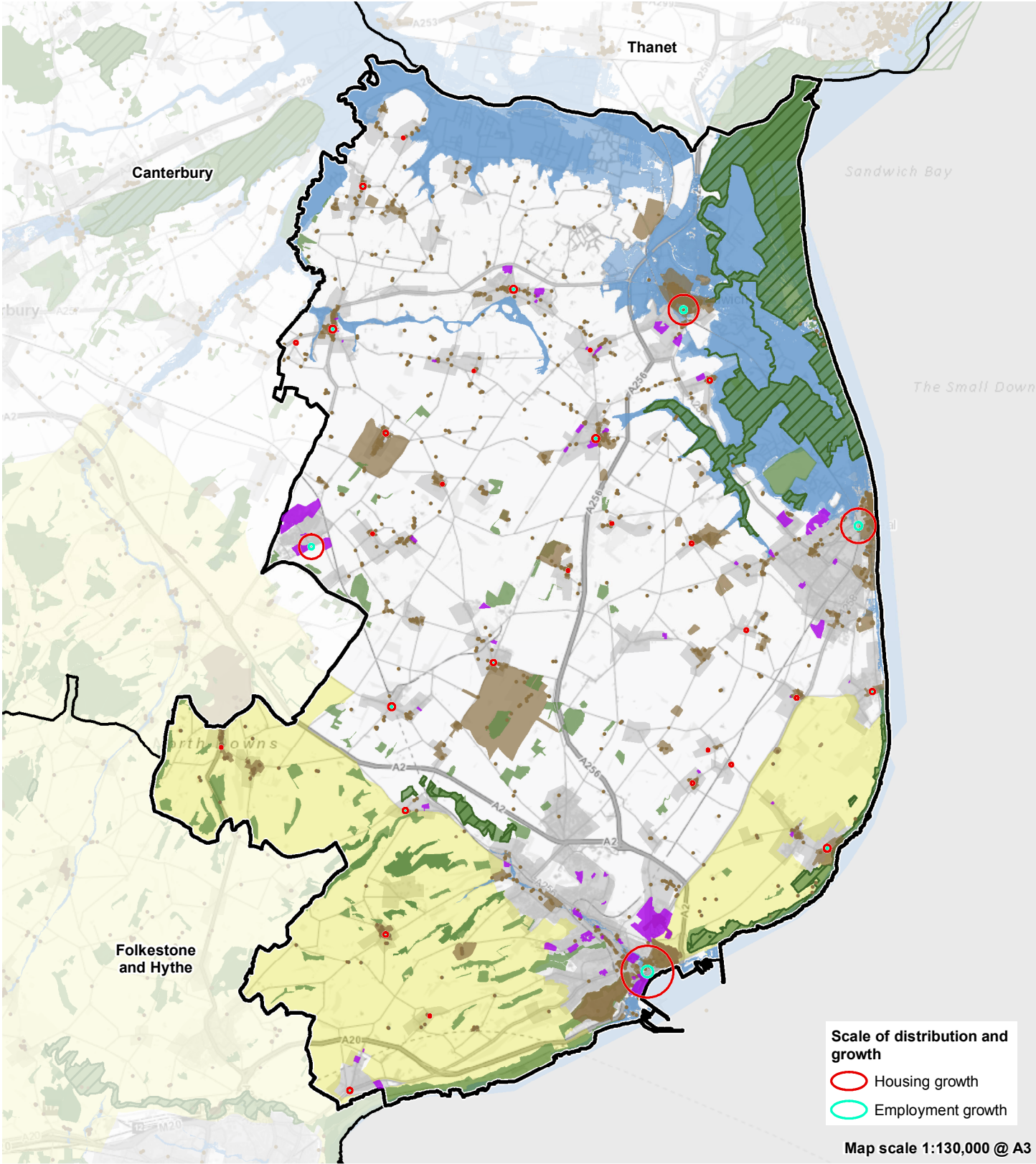
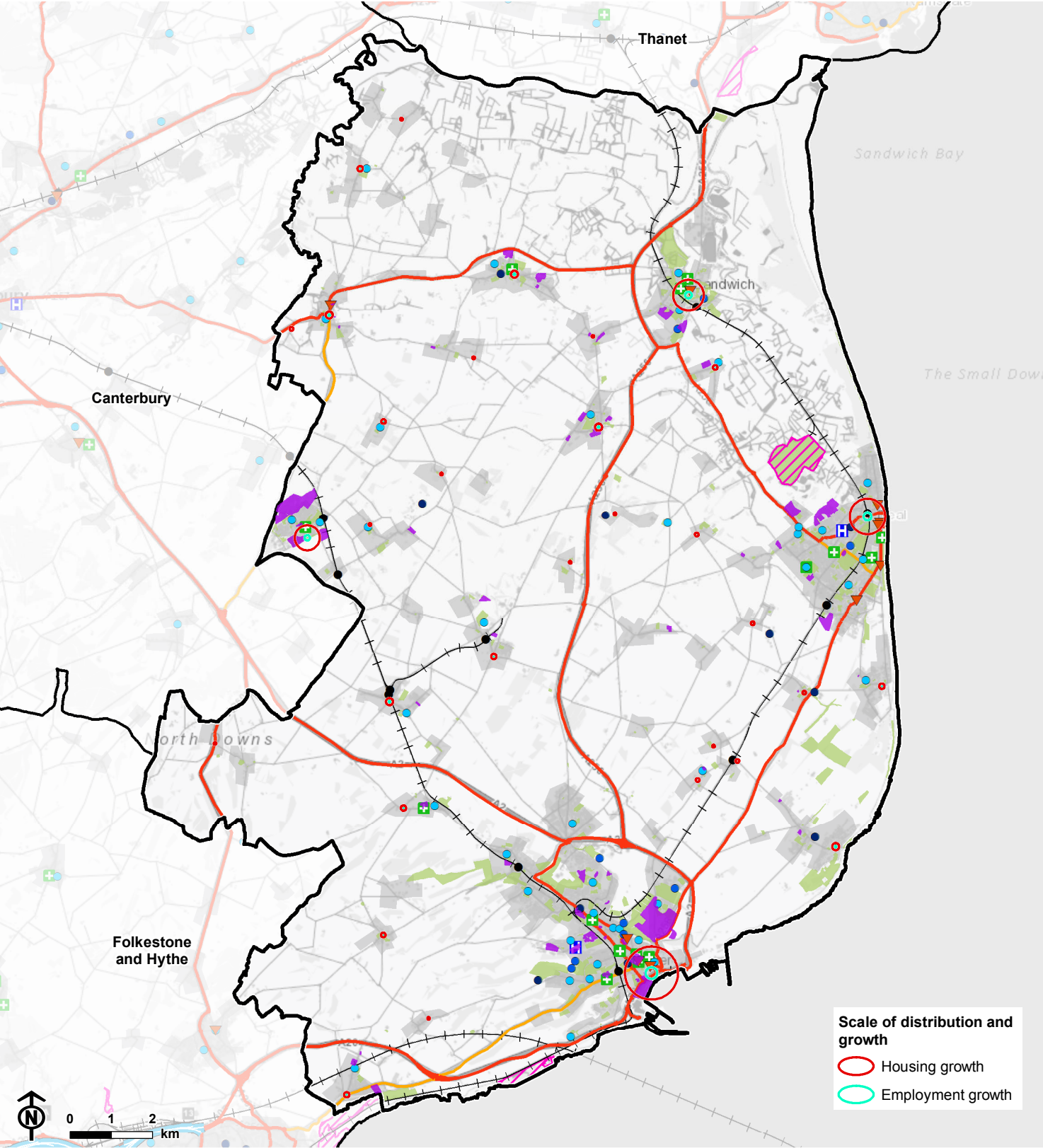
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

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- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.8: Spatial Option C (Settlement Hierarchy) / Growth Option 2 (Medium Growth)



CB:KC EB:Bean_C LUC FIGC_8_10043_A3L_27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

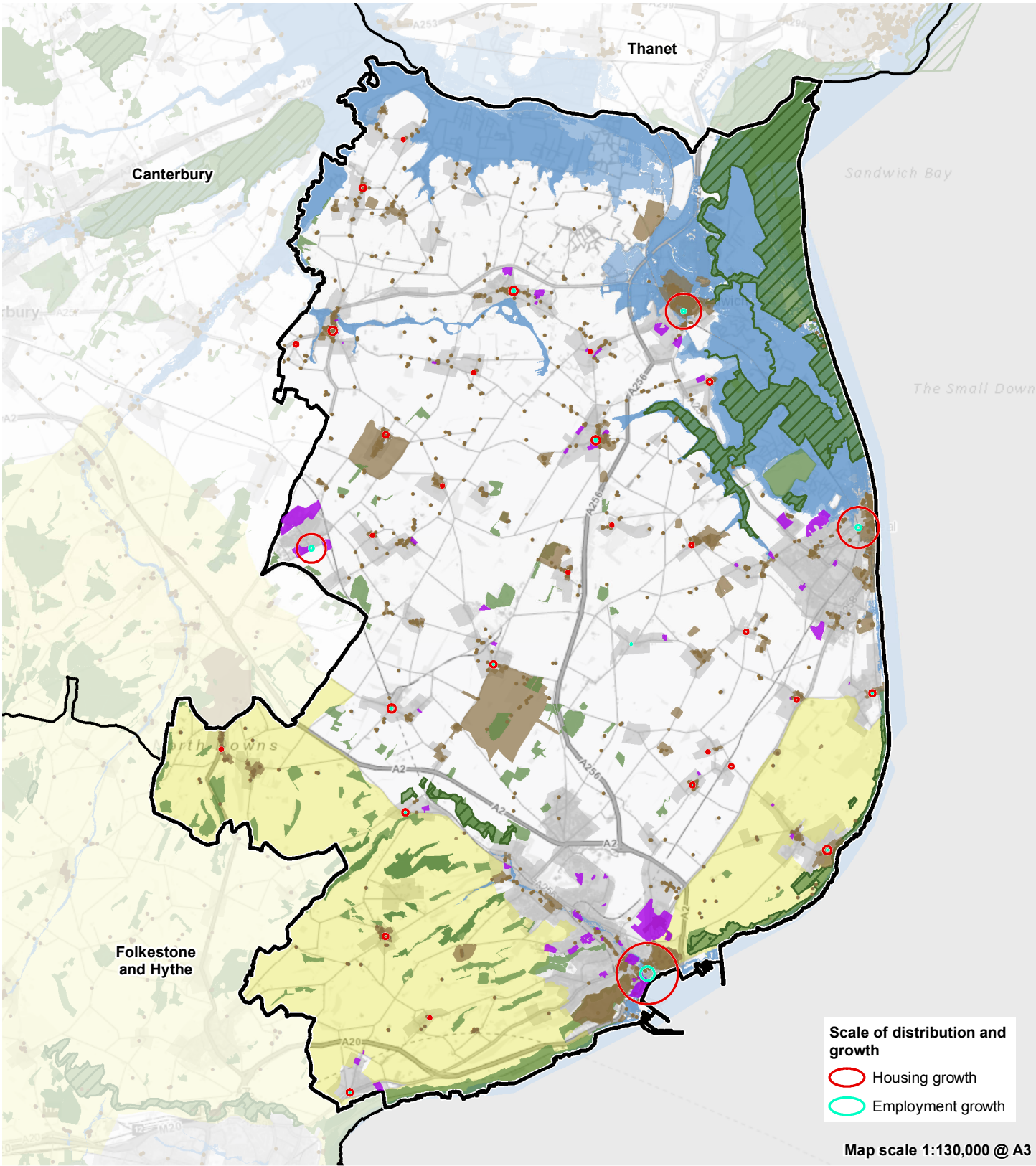
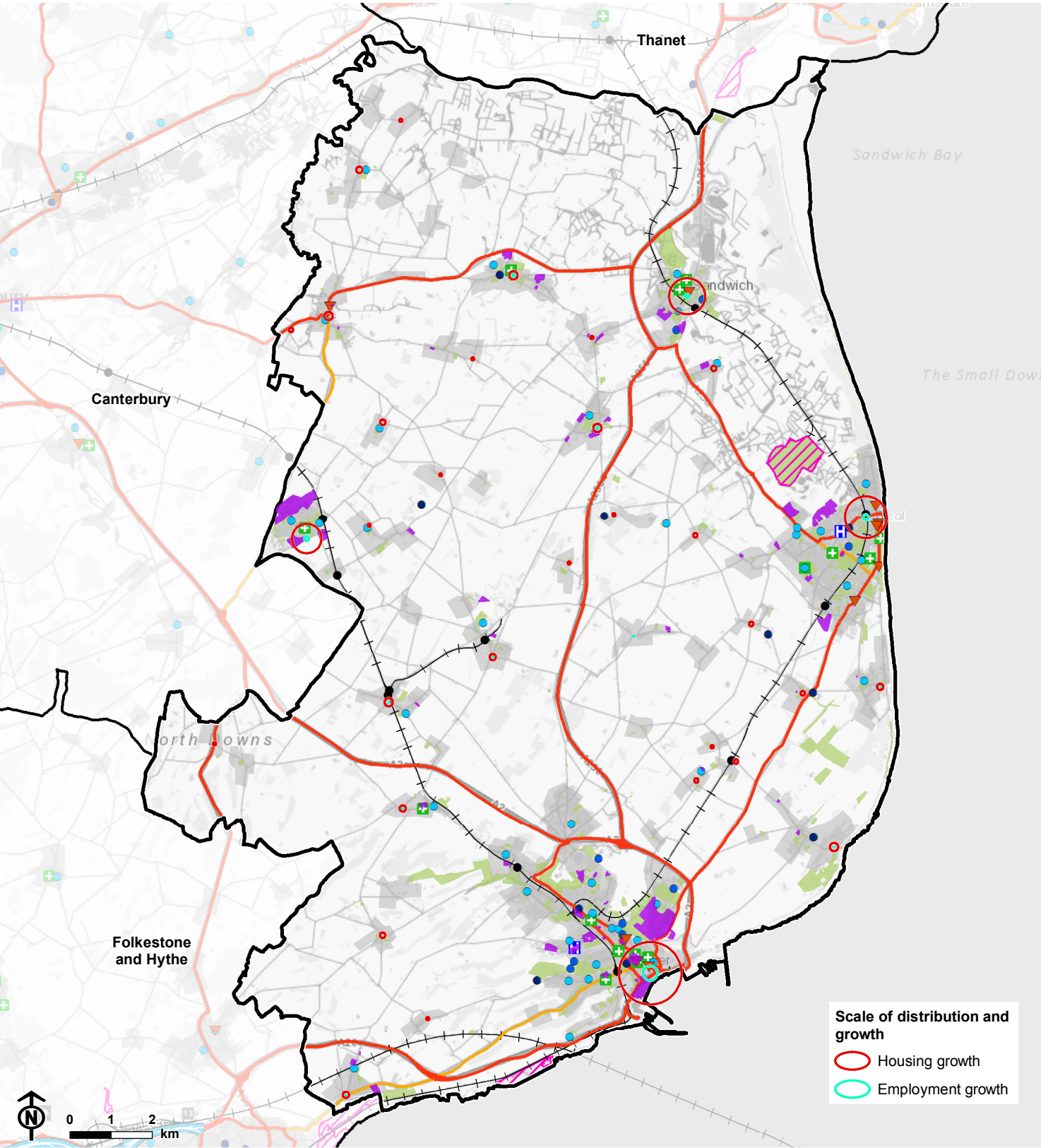
- District boundary
- Committed site
- Education**
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing**
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network**
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.9: Spatial Option C (Settlement Hierarchy) / Growth Option 3 (Highest Growth)



CB:KC EB:Bean_C LUC FIGC_9_10043_A3L 27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

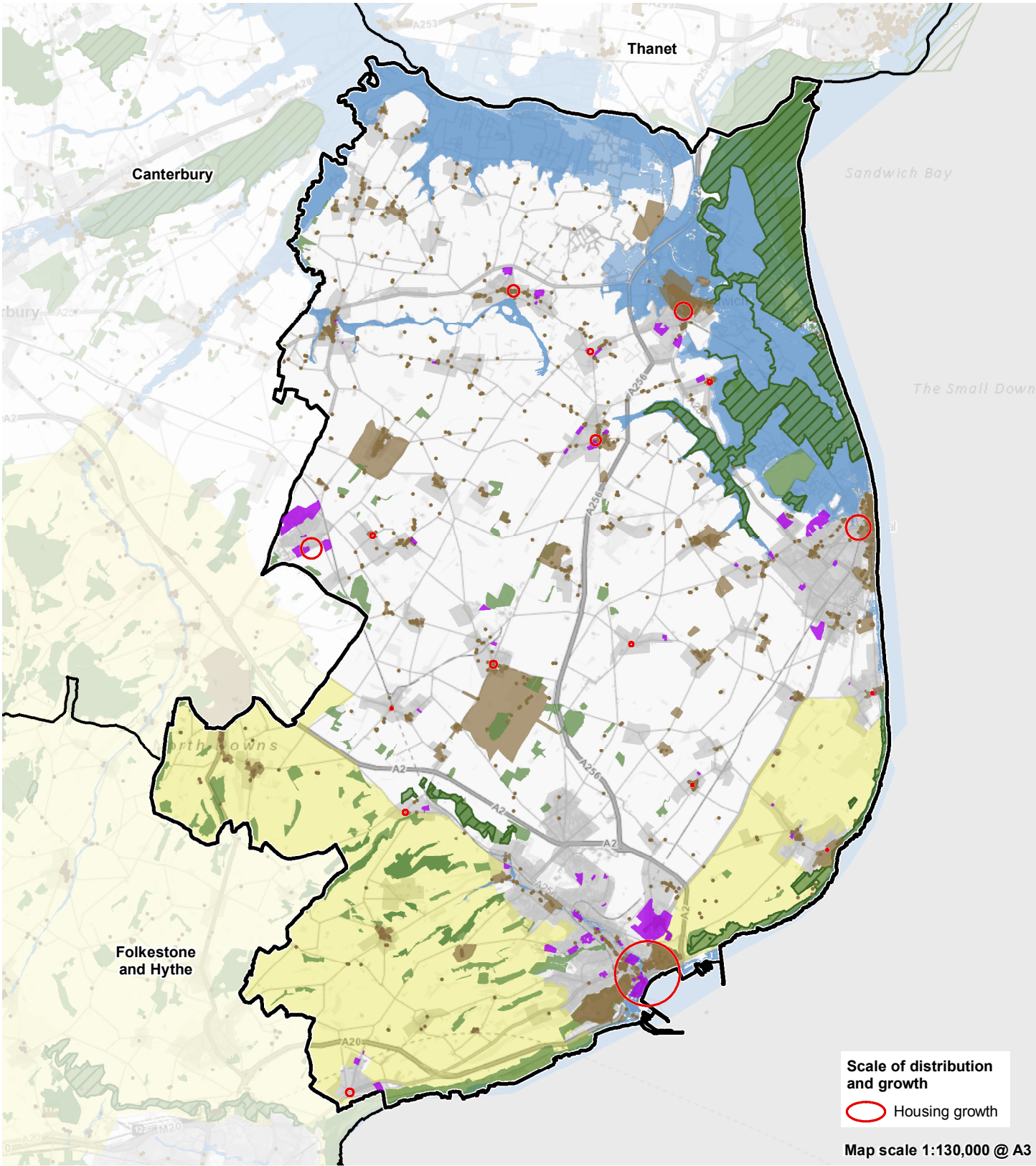
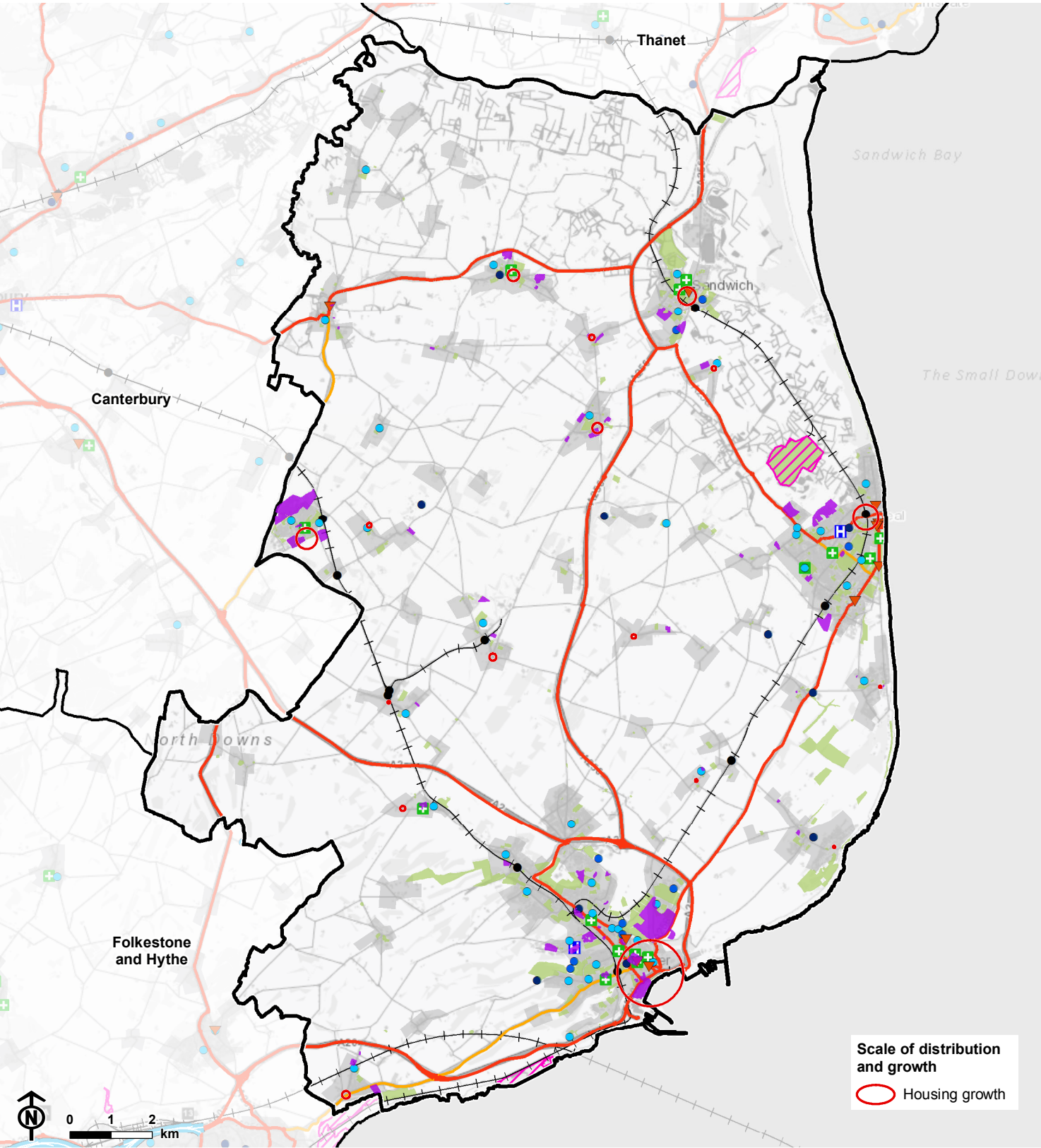
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.10: Spatial Option D (Adopted Plan Dover Focus) / Growth Option 1 (Lowest Growth)



Strategic Transport Infrastructure, Services and Facilities

- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.11: Spatial Option D (Adopted Plan Dover Focus) / Growth Option 2 (Medium Growth)

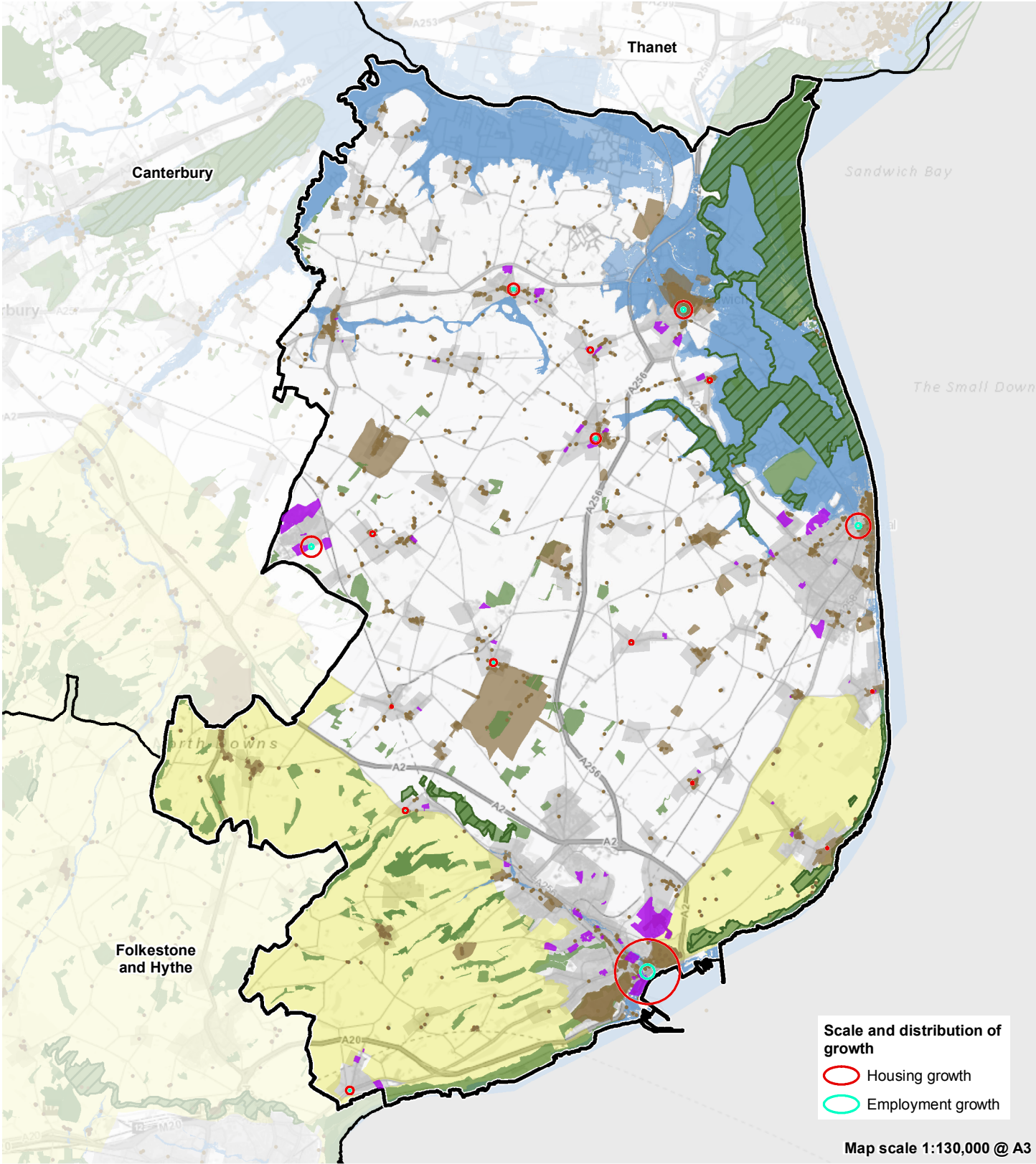
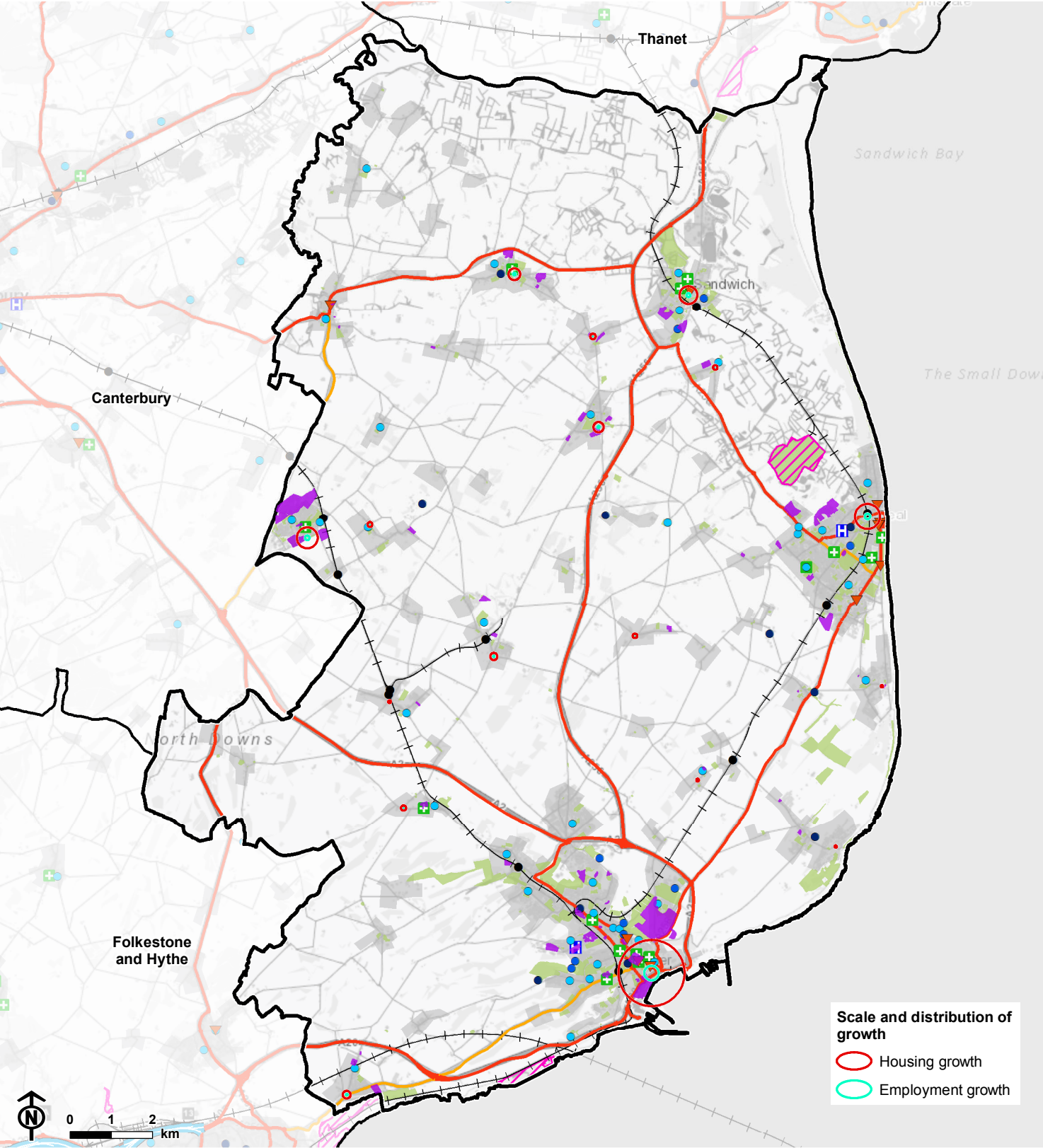
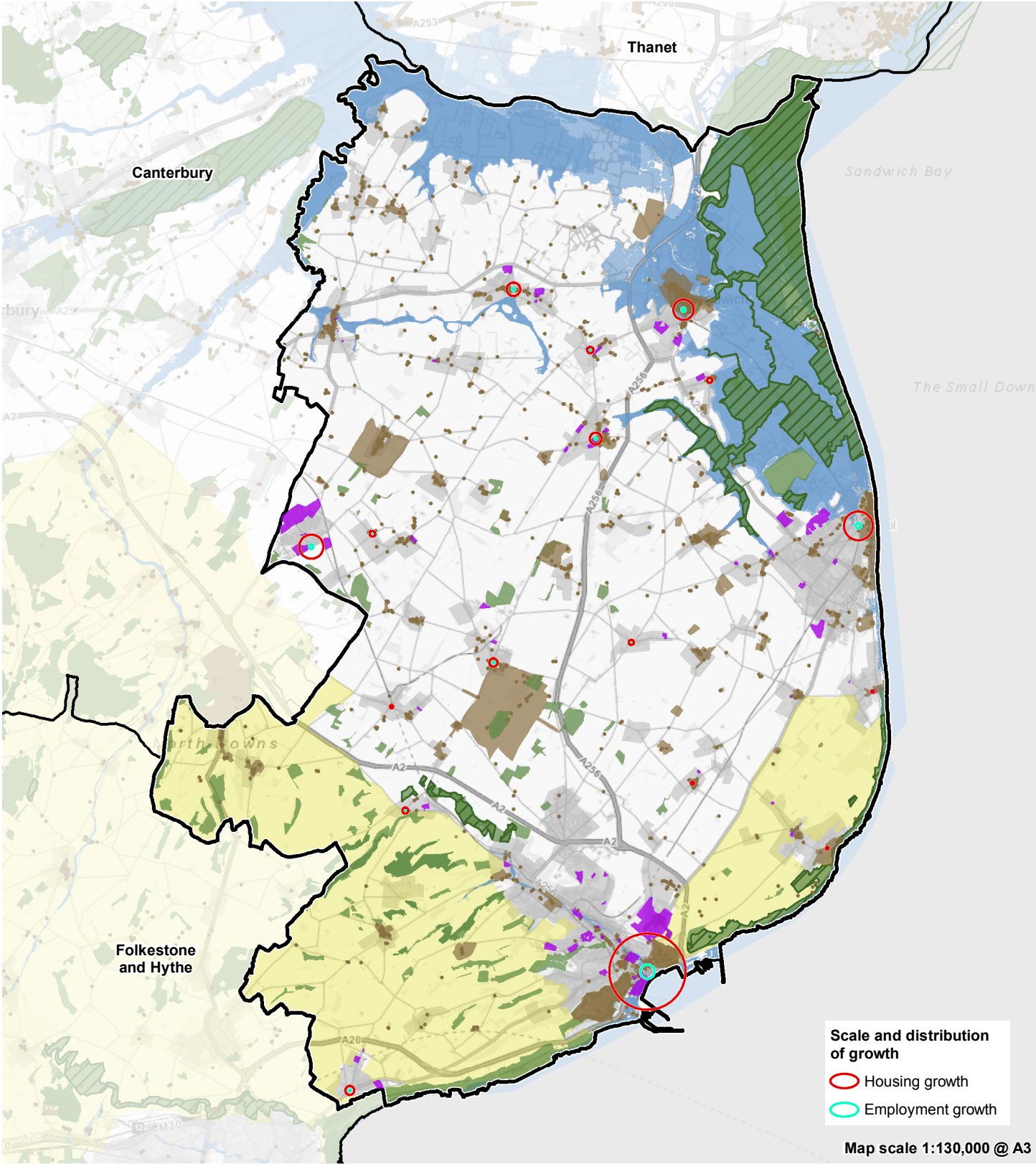
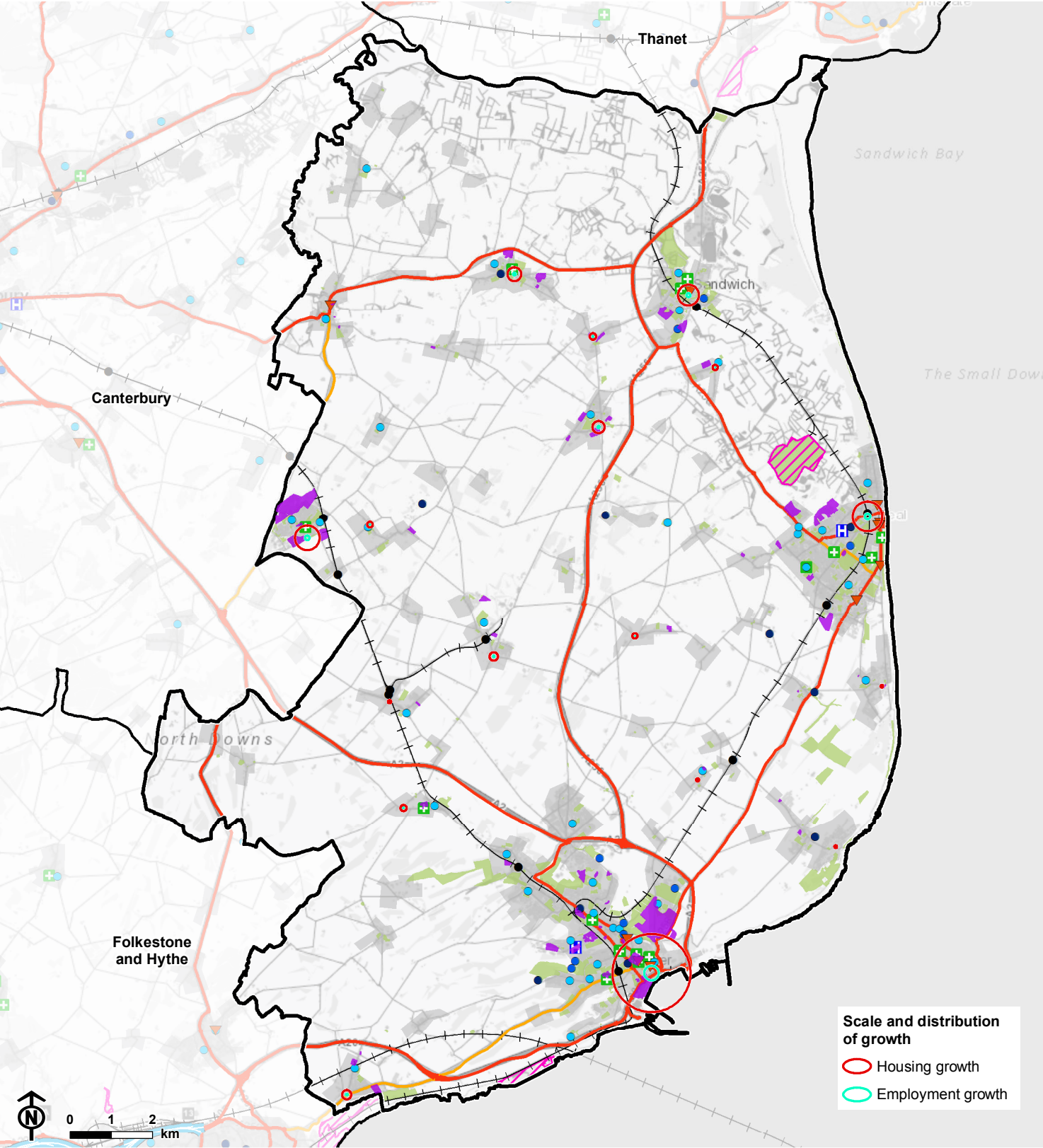


Figure C.12: Spatial Option D (Adopted Plan Dover Focus) / Growth Option 3 (Highest Growth)



Strategic Transport Infrastructure, Services and Facilities

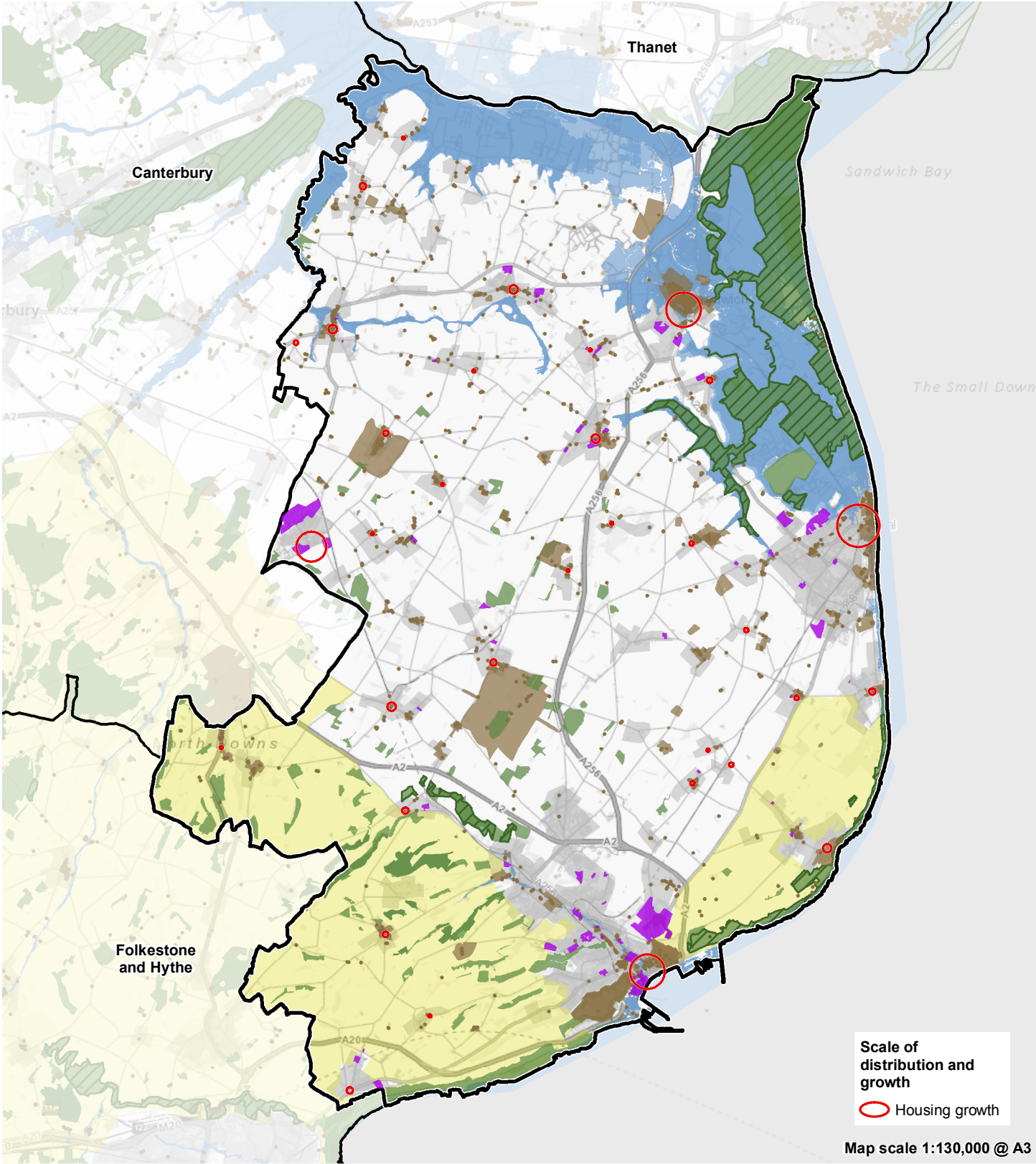
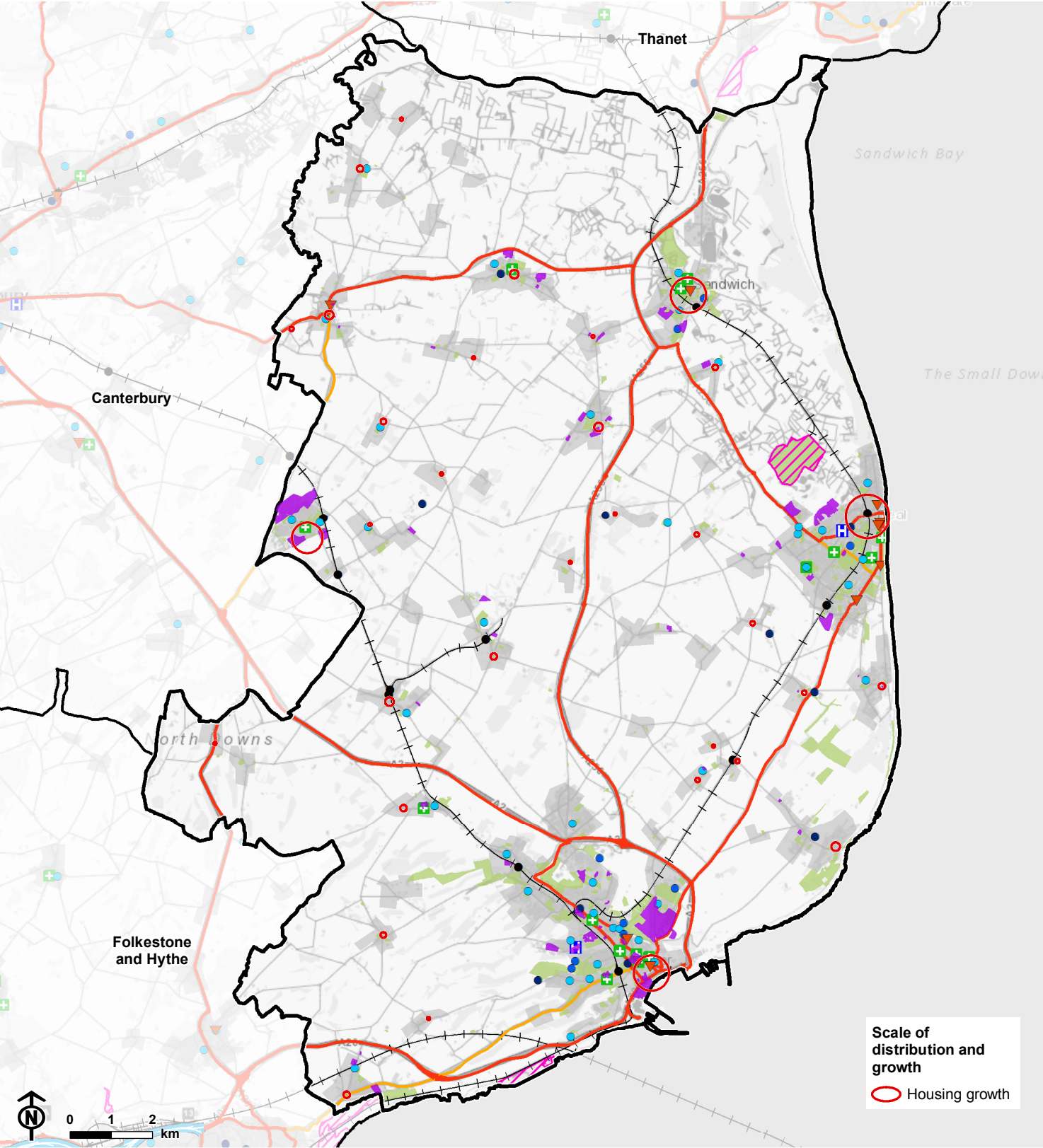
- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
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- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.13: Spatial Option E (More Even Settlement Focus) / Growth Option 1 (Lowest Growth)



CB:KC EB:Bean_C LUC FIGC_13_10043_A3L 27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

- District boundary

Committed site
- Primary

Secondary

Higher / further
- GP practice

Dentist

Hospital

Open space

Country park
- Motorway

A road

B road

Railway station

Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty

Historic environment constraint

Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3

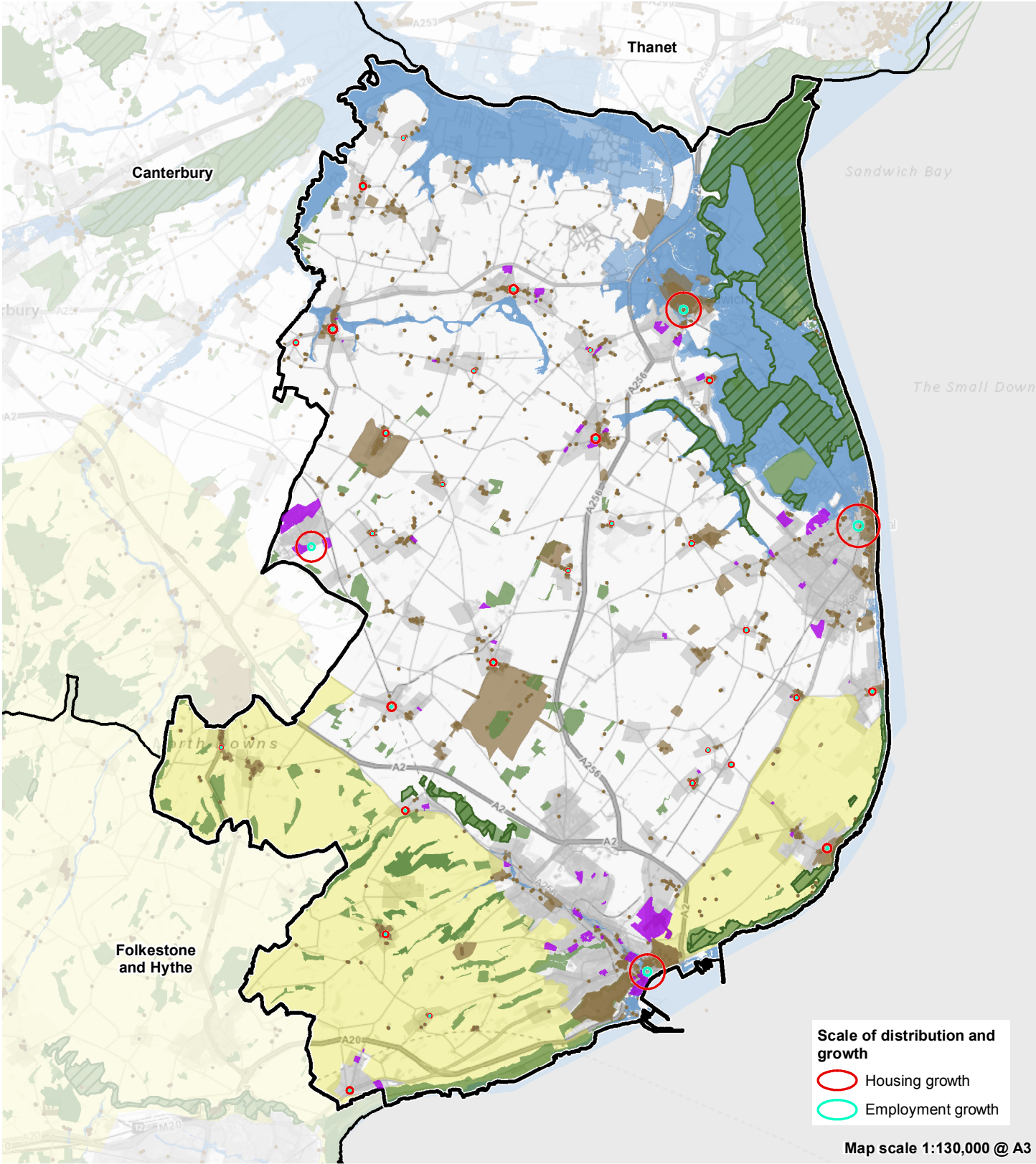
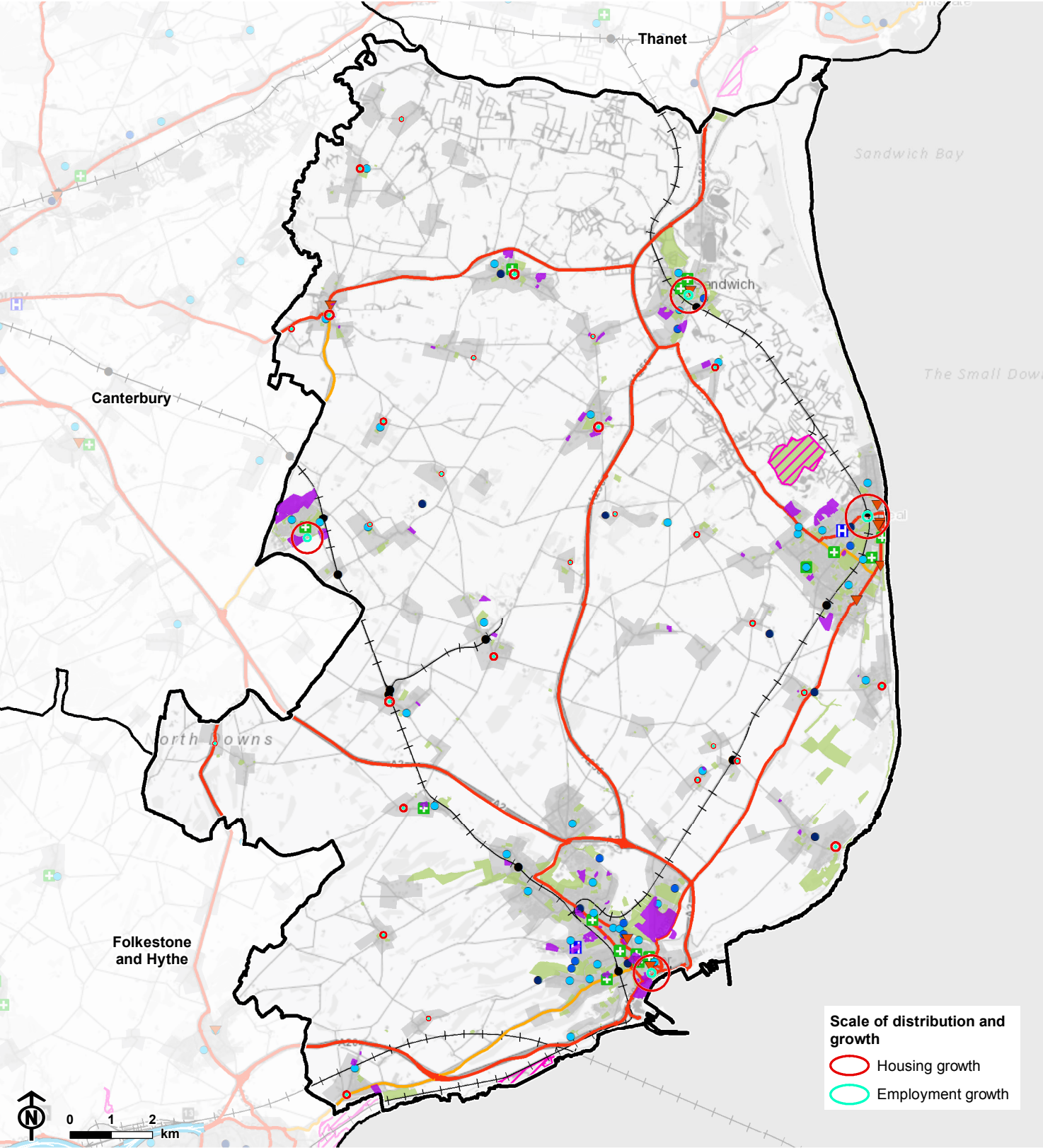
Blue shade appears darker where zone 2 and 3 overlap.

Local or national natural designations

Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations

Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Figure C.14: Spatial Option E (More Even Settlement Focus) / Growth Option 2 (Medium Growth)



CB:KC EB:Bean_C LUC FIGC_14_10043_A3L 27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

- District boundary

Committed site
- Primary

Secondary

Higher / further
- GP practice

Dentist

Hospital

Open space

Country park
- Motorway

A road

B road

Railway station

Railway track

Strategic Environmental Constraints

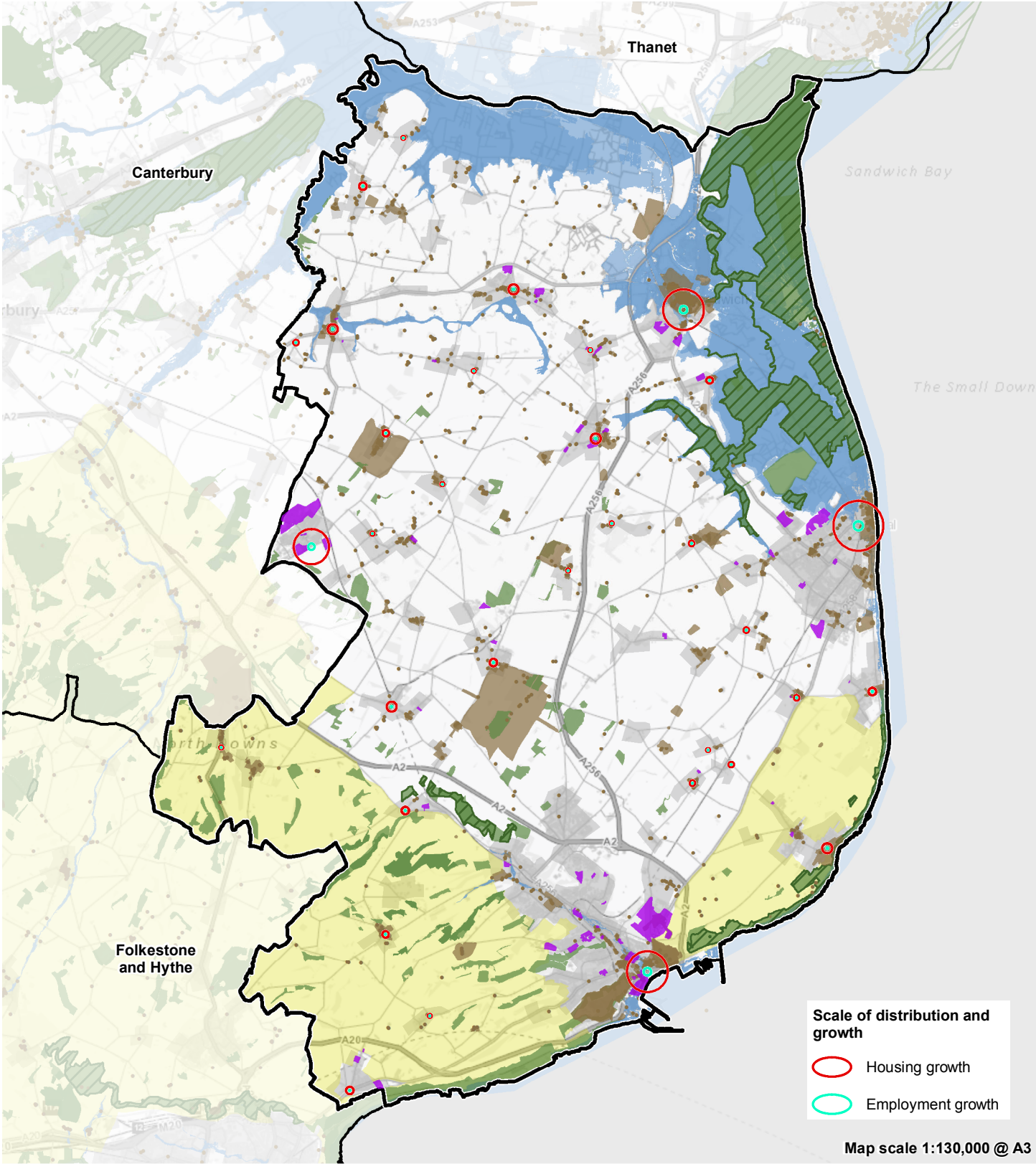
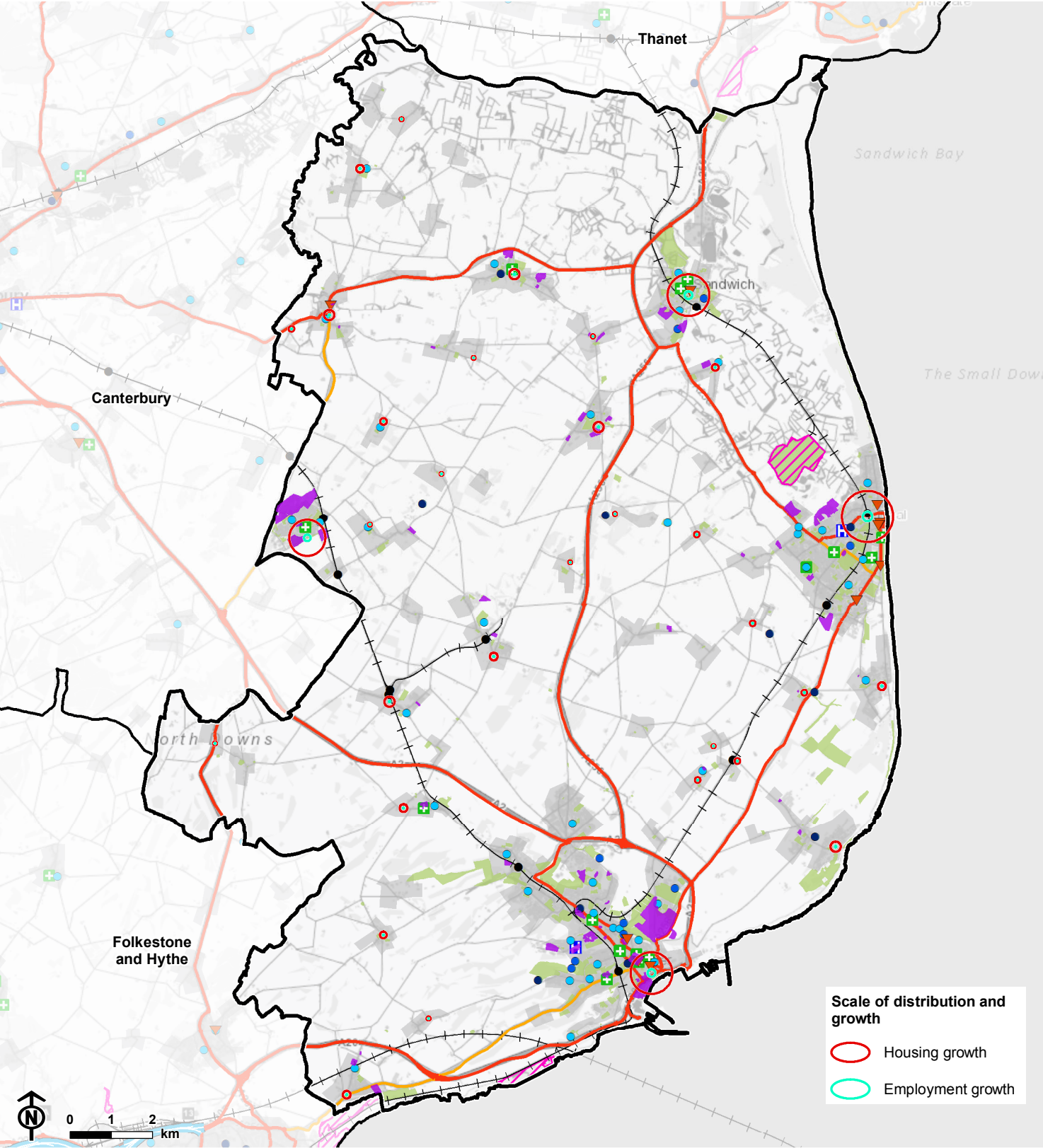
Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty

Historic environment constraint
- Flood zone 2 and/or 3

Local or national natural designations
- International natural designations

Figure C.15: Spatial Option E (More Even Settlement Focus) / Growth Option 3 (Highest Growth)



CB:KC EB:Bean_C LUC FIGC_15_10043_A3L 27/11/2020
Source: DDC, OS, EA, NE, HE

Strategic Transport Infrastructure, Services and Facilities

- District boundary
- Committed site
- Education
 - Primary
 - Secondary
 - Higher / further
- Health and wellbeing
 - GP practice
 - Dentist
 - Hospital
 - Open space
 - Country park
- Transport network
 - Motorway
 - A road
 - B road
 - Railway station
 - Railway track

Strategic Environmental Constraints

Note: the map omits the following other strategic environmental constraints to aid readability: Source Protection Zones, Agricultural Land Classifications, Mineral Safeguarding Areas, Surface Water Flood Risk and Local and National Priority Habitats. These environmental constraints can be views in Chapter 3 (Sustainability Context) of the SA Report.

- Area of Outstanding Natural Beauty
- Historic environment constraint
 - Includes listed buildings, scheduled monuments, conservation areas and registered parks and gardens.
- Flood zone 2 and/or 3
 - Blue shade appears darker where zone 2 and 3 overlap.
- Local or national natural designations
 - Includes Sites of Special Scientific Interest, National and Local Nature Reserves, ancient woodland and regionally important geological sites.
- International natural designations
 - Includes Special Areas of Conservation, Special Protection Areas and Ramsar sites.

Appendix D

Site assessment criteria and assumptions

Table D1: Residential site assessment criteria and assumptions

SA objective		Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 1: 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.
SA 2: 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	Each criterion 2a to 2h is scored: <ul style="list-style-type: none"> Significant positive +3 Minor positive +1 Minor negative -1 Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 8). Overall significance is scored as follows: <ul style="list-style-type: none"> Significant positive >= +2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative >= -2
		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, 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	

Appendix D

Site assessment criteria and assumptions

Draft Dover District Local Plan (Reg 18) Sustainability Appraisal
December 2020

SA objective		Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
		2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,201m 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	801-1,201m from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and well-being	2i AQMAs	N/A	N/A	All other sites.	Site located within 500m of an AQMA (The World Health Organization's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO2 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>

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SA objective		Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
		2j Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry	
		2k Exposure to noise pollution from roads and railways	N/A	N/A	All other sites	Ln _{night} 50.0-54.9 dB, or L _{aeq,16} 55.0-59.9 dB	Ln _{night} >=55.0 dB, or L _{aeq,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) <=250 m to waste management facility	
SA 3: 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.
SA 4: 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	Each criterion 4a to 4c and 2a to 2h is scored: <ul style="list-style-type: none">Significant positive +3Minor positive +1Minor negative -1Significant negative -3
		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	

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
							<p>Scores totalled, and then averaged (i.e. total score divided by 11). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> Significant positive $\geq +2$ Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative ≥ -2
	2b Open space, sport, recreation facilities, open country and registered common land	$\leq 300\text{m}$ 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	$>1,200\text{m}$ from open space, sport and recreation facility OR Loss of $\geq 25\%$ open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (ProW) / Cycle Paths	$\leq 200\text{m}$ from PRoW / Cycle Paths	201-400m from PRoW / Cycle Paths	N/A	401-800m from PRoW / Cycle Paths	$>800\text{m}$ from PRoW / Cycle Paths	
	2d Primary and middle schools	$\leq 400\text{m}$ from primary or middle school	401-800m from primary or middle school	N/A	801-1,201m from primary or middle school	$>1,200\text{m}$ from primary or middle school	
	2e Secondary schools	$\leq 500\text{m}$ from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	$>2,000\text{m}$ from secondary school	
	2f Further and higher education facilities	$\leq 500\text{m}$ 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	$>2,000\text{m}$ from Further and higher education facilities	
	2g Centres of employment	$\leq 500\text{m}$ from Strategic Employment	501-1,000m from Strategic Employment	N/A	1,001-2000m from Strategic Employment	$>2,000\text{m}$ from Strategic Employment	

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
		Site/Enterprise Zone	Site/Enterprise Zone		Site/Enterprise Zone	Site/Enterprise Zone	
	2h Town Centres	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre	
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.	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.	<p>Significant proportion (>=25%) of site on Grade 3 agricultural land.</p> <p>OR</p> <p>Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site.</p>	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	
SA 6: To reduce air pollution and ensure air quality continues to improve.	<p>The proximity of sites to Air Quality Management Areas (AQMA) does not appropriately test the potential for such sites to generate road traffic through AQMA. 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 assesses the likely effects of selected sites on the District's NO₂ or PM₁₀ levels. These findings have been used to appraise the effects of the Council's preferred site policies.</p>						<p>All sites score a negligible uncertain effect against this objective (0?) at this stage.</p>

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 7: 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
	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	If only one criterion 7a to 7b scores minor negative, then the score is minor negative. All other sites score negligible (0).
SA 8: 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 4c and 2a to 2h is scored:
	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	<ul style="list-style-type: none"> Significant positive +3 Minor positive +1
	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	<ul style="list-style-type: none"> Minor negative -1 Significant negative -3
	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	Scores totalled, and then averaged (i.e. total score divided by 11). Overall significance is scored as follows: <ul style="list-style-type: none"> Significant positive >= +2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative >= -2

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	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	801-1,201m 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	801-1,201m from town centre	>1,200m from town centre	
SA 9: 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	Intersects with designated site	<p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 9a to 9d score minor negative, then the score is significant negative.</p> <p>If only one criterion 9a to 9d scores minor negative, then the score is minor negative.</p>

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
					relevance of IRZ: <ul style="list-style-type: none"> • 500+ • 100+ • 50+ • 10+ Using the density assumption of 30dph, only sites capable of accommodating units equal to or more than these categories rate light red.		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 Priority 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	

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 10: 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 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.
SA 11: 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 D2: Employment site assessment criteria and assumptions

SA objective		Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 1: 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.
SA 2: 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	Each criterion 2a to 2d is scored: <ul style="list-style-type: none"> Significant positive +3 Minor positive +1 Minor negative -1 Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows: <ul style="list-style-type: none"> Significant positive >= +2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative >= -2
		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, 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	

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SA objective		Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
		2d Town Centres	<=400m from town centre	401-800m from town centre	N/A	801-1,201m from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and well-being	2f AQMAs	N/A	N/A	All other sites.	Site located within 500m of an AQMA (The World Health Organization's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO2 has a gradient of 200-500m).	Site located within AQMA	If any of the criteria score major negative then the score is significant negative. If two or more of criteria 2f to 2i score minor negative, then the score is significant negative. If only one criterion 2f to 2i scores minor negative, then the score is minor negative. All other sites score negligible (0).
		2g Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry	
		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) <=250 m to waste management facility	
SA 3: 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.

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 4: 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 4c and 2a to 2d is scored:</p> <ul style="list-style-type: none"> Significant positive +3 Minor positive +1 Minor negative -1 Significant negative -3 <p>Scores totalled, and then averaged (i.e. total score divided by 7). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> Significant positive >= +2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative >= -2
	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	801-1,201m from town centre	>1,200m from town centre	
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.	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.

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	5b Agricultural land classification	N/A	N/A	All other sites.	Significant proportion ($\geq 25\%$) of site on Grade 3 agricultural land. OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site.	Significant proportion ($\geq 25\%$) 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	
SA 6: To reduce air pollution and ensure air quality continues to improve.	<p>The proximity of sites to Air Quality Management Areas (AQMA) does not appropriately test the potential for such sites to generate road traffic through AQMA. 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 assesses the likely effects of selected sites on the District's NO₂ or PM₁₀ levels. These findings have been used to appraise the effects of the Council's preferred site policies.</p>						All sites score a negligible uncertain effect against this objective (0?) at this stage.
SA 7: 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.	$\geq 25\%$ of site within Flood Zone 2	$\geq 25\%$ 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	

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 8: 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 4c and 2a to 2d is scored: <ul style="list-style-type: none"> Significant positive +3 Minor positive +1 Minor negative -1 Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 7). Overall significance is scored as follows: <ul style="list-style-type: none"> Significant positive >= +2 Minor positive >0 to <2 Negligible 0 Minor negative <0 to <-2 Significant negative >= -2
	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	801-1,201m from town centre	>1,200m from town centre	
SA 9: To conserve, connect and enhance the District's wildlife habitats and species.	9a Internationally and nationally designated	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution' and 'water supply' or	Intersects with designated site	If any of the criteria score major negative then the score is significant negative.

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	biodiversity assets				'all planning applications' IRZ		<p>If two or more of criteria 9a to 9d score minor negative, then the score is significant negative.</p> <p>If only one criterion 9a to 9d scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>
	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 Priority 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	
SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	Proximity to historic assets: sites within existing settlements	N/A	N/A	All other sites	101-250 m	<=100 m	<p>One criterion for every site (either rural or urban) therefore criteria effects correspond directly into significance scores. However, all effects to acknowledge uncertainty (?) in the absence of detailed local evidence:</p> <ul style="list-style-type: none"> Dark Red = --? Light Red = -? All other = 0?
	Proximity to historic assets: sites outside of existing settlements	N/A	N/A	All other sites	501-1000 m	<500 m	

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SA objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	Proximity to designated landscapes: sites outside of existing settlements	N/A	N/A	All other sites	<=5 km to designated landscape	Intersects with designated landscape	<p>One criterion for every site (either rural or urban) therefore criteria effects correspond directly into significance scores. However, all effects to acknowledge uncertainty (?) in the absence of detailed local evidence:</p> <ul style="list-style-type: none"> Dark Red = --? Light Red = -? All other = 0?
	Proximity to designated landscapes: sites within existing settlements	N/A	N/A	All other sites	Intersects with designated landscape	N/A	

Appendix E

Reasons for the selection of sites in light of the reasonable alternatives

The Selection of Site Allocations for the Draft Local Plan

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 suitable¹;
- 41 sites as potentially suitable²; and
- 197 sites as unsuitable³.

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 available⁴;
- 12 sites as potentially available⁵; and
- 8 sites as unavailable⁶.

¹ 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.'

² 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.'

³ 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.'

⁴ 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.'

⁵ 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.'

⁶ 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.'

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 Appendix D Table D1. 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 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 1.

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>ALK003 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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
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>ASH003, ASH004, ASH010, ASH011, ASH014 and ASH015 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>
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>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>

						<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.	<p>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.</p> <p>AYL003 and AYL004 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.</p>
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.	
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>AYL001 and AYL002 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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
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 (CAP006, CAP009, CAP011 and CAP013).
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
Deal						
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 (DEA008, DEA018, DEA020, DEA021, SHO002, SHO004, GTM003 and WAL002). 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.	
Sholden						
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.
Great Mongeham						
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10	Medium	Heritage Assessment required. A generous landscaping scheme is required.	
Walmer						
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
Dover						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 (WHI008), and the proposed northern extension to the site (WHI001), 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
DOV006	Land at Dundedin Drive, Dover	0.37	8	Medium	Archaeological Assessment required. Existing trees should be retained where possible.	
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.	planning permissions to take this site forward. Furthermore, it is proposed to continue with the regeneration of key sites in the Town Centre including Dover Waterfront (DOV017) and Mid Town (DOV018) (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. 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 DOV006, DOV008, DOV009, DOV012, DOV019, DOV022B, DOV022C, DOV022E, DOV023, DOV025, DOV026, DOV028, DOV030, GUS002 and WHI006). 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. Sites confirmed as unavailable include DOV010, DOV021, DOV022A, DOV029 and DOV035 .
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.
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.	
Guston						
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.	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.
Whitfield						

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. 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 EAS002 , EAS009 , and EAS012). EAS007 is detached from the settlement and is proposed primarily for employment, therefore it is not proposed to allocate this site for housing.
EAS009	Eastry Court Farm, Eastry	0.84	5	Medium	Transport Assessment and Heritage Assessment required. Existing trees should be retained where possible.	
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.	

						<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	Transport Assessment and Archaeological Assessment required. Cumulative impact on the highway to be addressed. Existing trees and hedgerow should be retained where possible and a generous landscaping scheme should be provided.	<p>Eythorne and Elvington to create a new local centre in the District.</p> <p>EYT003, EYT009 and EYT012 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	Archaeological Assessment required Site in a KCC Minerals area. A landscape buffer is required.	<p>EYT001, EYT008 and EYT019 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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
GOO006	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 GOO006 was best related to the settlement, and less constrained than GOO007. GOO007 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>KIN002 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	Transport Assessment and Archaeological Assessment required. Impact on local rural road network to be addressed. A generous landscaping scheme is required to mitigate impact on the countryside.	<p>East Langdon is a large village where development would be acceptable in principle in or adjoining the settlement.</p> <p>LAN003 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	Transport Assessment and Heritage Assessment required. Impact on Canterbury Rd/ Church lane junction to be addressed. Existing trees and hedgerow should be retained where possible and a generous landscaping scheme is required to mitigate impact on the countryside.	<p>Lydden is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p>LYD003 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 (NON006), 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	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
NOR005	Betteshanger Colliery, Betteshanger, Deal	20.69	210	Short	Heritage Assessment, Transport Assessment and Land Contamination Assessment required. 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 to provide a generous landscape buffer.	<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 NOR005 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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
PRE003	Apple Tree Farm, Stourmouth Road	0.76	12	Medium	Transport Assessment required.	Preston is a large village where development would be acceptable in principle in or adjoining the settlement
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.	<p>PRE003, PRE016 and PRE017 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>
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.	

Ringwould

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)		
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 RIN004 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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	2.10	32	Medium	Transport Assessment, Heritage Assessment and Land Contamination 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.	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. 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. SAN006, SAN007, SAN008, SAN013, SAN015, SAN019 and SAN023). 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.
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	1.58	80	Medium	Transport Assessment and Heritage Assessment required. Cumulative highways impact to be addressed Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required. Existing screening should be retained and enhanced.	
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.7	35	Medium	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.	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.

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. 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.
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.	
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.	

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
SHE003	Land to the north of Westcourt Lane, Shepherdswell	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.	Shepherdswell 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 Shepherdswell (i.e SHE003 , SHE004 , SHE006 and SHE008). 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, Shepherdswell	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.	SHE001 is unavailable. A number of key considerations have been identified in relation to the proposed site allocations in Shepherdswell 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
SHE006	Land at Botolph Street Farm, Shepherdswell	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, Shepherdswell	0.38	10	Medium	Archaeological Assessment required. Cumulative impact on the local rural road network to be addressed	

						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 Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
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 STA004 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 STM003 , STM006 , STM007 and STM008). 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 WIN003 ,
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>WIN004 and WIN014). 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 WOO005 and WOO006 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>WOR006 and WOR009 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.