



Dover District Council
Sustainability Appraisal of the Submission Core Strategy

Main Report

January 2009

Revision Schedule

Core Strategy Submission SA Report January 2009

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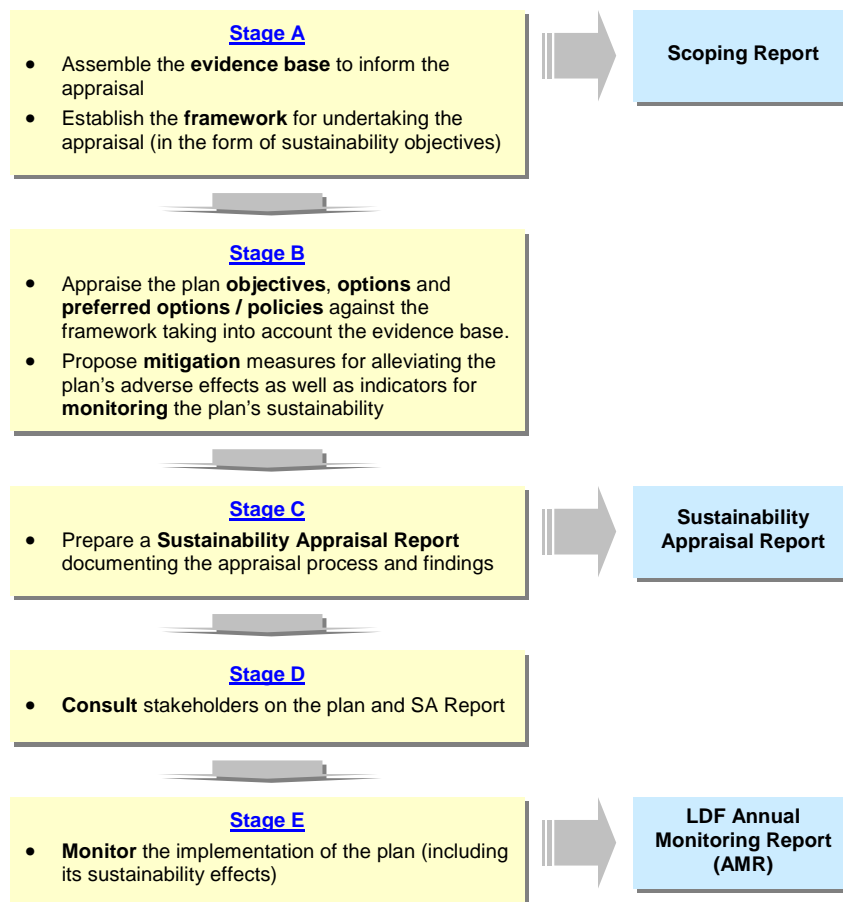
1 Introduction

- 1.1.1 Scott Wilson were commissioned by Dover District Council to undertake an independent **Sustainability Appraisal (SA)** of the District's Core Strategy. SA seeks to identify the economic, social and environmental impacts of a plan and suggests ways to avoid or minimise negative impacts and maximise positive ones. One SA Report has already been published setting out the appraisal of an earlier iteration of the Core Strategy – known as the Core Strategy Preferred Options Document. This report sets out the findings of the SA of the 'submission' version of the Core Strategy, known as the **Core Strategy Submission Document**.

1.2 SEA/SA

- 1.2.1 Strategic Environmental Assessment (SEA) involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs). An LDF is a folder of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) that together outline the approach to planning that will be followed within a local authority (e.g. Dover District) area. This is the first round of LDF production, with LDFs replacing the incumbent local hierarchy of development plans (Unitary Development Plans, and Local Plans).
- 1.2.2 The Government's approach is to incorporate the requirements of the SEA Directive into a wider process that considers economic and social as well as environmental effects. This combined process is known as 'Sustainability Appraisal (SA)'. Under the Planning and Compulsory Purchase Act 2004 (enacted through the Town and Country Planning Regulations, 2008), Local Authorities must undertake SA for each of their DPDs and SPDs – the constituent parts of the LDF. SA is therefore a statutory requirement for LDFs along with SEA. In November 2005, the Government published guidance – which the Consultants are following - on undertaking SA of LDFs which incorporates the requirements of the SEA Directive ('the Guidance').
- 1.2.3 The Guidance advocates a five-stage approach to undertaking SA (see **Figure 1**). Stage A of the process has been carried out, with the Scoping Report documenting the findings being formally accepted by the Council in April 2005. The Scoping Report was updated with a Scoping Report Addendum produced in December 2007.

Figure 1: The five stage approach to SA



1.3 This Report

1.3.1 This report documents Stage B and summarises Stage A of the process. In doing so it fulfils the requirements of Stage C. Stage B of the SA process involves the main body of appraisal work and consists of five key tasks:

- B1** – Testing the DPD Objectives against the SA Framework;
- B2** – Developing and Refining Options;
- B3** – Predicting and assessing effects;
- B4** – Identifying mitigation measures; and
- B5** – Developing monitoring proposals;

- 1.3.2 Stage B has been an iterative process. Options were first developed and considered through community and stakeholder engagement, including a programme of workshops. In particular, four strategic growth options for the District were developed and given initial consideration.
- 1.3.3 Following this, the Council's 'preferred options' were set out in a Core Strategy Preferred Options Document, which was published for a six week public consultation in March 2008. This consultation was an opportunity for all interested stakeholders to make formal representations on the development of the Core Strategy.
- 1.3.4 An SA Report was published for consultation alongside the Core Strategy Preferred Options, setting out an appraisal of each of the preferred options as well as setting out recommendations for how the preferred options might be improved. As well as appraising the Council's preferred options the SA Report also set out a comparative appraisal of each of the Council's four strategic growth options as well as options relating to strategic allocations.¹
- 1.3.5 The Council have taken account of all representations made during the six week consultation on preferred options, as well as the findings of the SA Report, and as a result has been able to produce a complete draft plan for the first time. This draft plan is known as the Submission Core Strategy. This **Submission SA Report** documents the appraisal of the Submission Core Strategy. The focus of this SA is on only those elements of the draft plan that have changed significantly since the preferred options stage, and so much of the plan's contents have been screened out of requiring further appraisal. However, where appraisal findings from the Preferred Options SA Report are still relevant they have also been included in this report.
- 1.3.6 The rest of this SA Report is structured as follows:
- Chapter 2 -** Sets out a summary of **Stage A** of the SA Process
 - Chapter 3 -** Further introduces the Submission DPD and how **SA Stage B2** has been approached
 - Chapter 4 -** Describes the appraisal methodology
 - Chapter 5 -** Summarises the main appraisal and includes recommendations and mitigation measures (**SA Stages B3 and B4**)
 - Chapter 6 -** Makes conclusions regarding the findings of the appraisal and sets out monitoring proposals (**SA Stage B5**) that should be taken on-board by the Council.
 - Chapter 7 -** Sets out the next steps in the SA / plan-making process.
 - Appendices -** Set out the detailed appraisal findings

¹ Available online @ <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09)

Meeting the requirements of the SEA Directive

- 1.3.7 The SEA Directive sets out certain procedural elements that must be followed. In particular, the SEA Directive requires the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This report incorporates the information that must be included in the Environmental Report. An SEA roadmap, demonstrating how this report conforms to the Directive is shown in **Table 1**. In order to retain clarity, the stages of the process that address the requirements of the SEA Directive are also clearly highlighted in boxes where necessary. Furthermore, an SEA/SA checklist is included as **Appendix 1**.

Table 1: SEA roadmap

Environmental Report requirements ²	Section of this report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	<i>Chapters 1, 2 and 3</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	<i>Chapter 2</i>
(c) the environmental characteristics of areas likely to be significantly affected;	<i>Chapter 2</i>
(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 (The Birds Directive) and 92/43/EEC (The Habitats Directive);	<i>Chapter 2</i>
(e) the environmental protection objectives, established at international, Community or Member State 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;	<i>Chapter 2</i>
(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;	<i>Chapters 5 and 6</i>
(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;	<i>Chapters 5 and 6</i>
(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;	<i>Chapters 3 and 4</i>
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	<i>Chapter 6</i>
(j) a non-technical summary of the information provided under the above headings.	<i>Non-technical Summary (separate volume)</i>

² As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment)

2 Stage A Findings

2.1 Introduction

- 2.1.1 Stage A of the SA process involved gathering evidence regarding the sustainability baseline and sustainability context in Dover District. This evidence was used to develop a set of sustainability objectives against which the sustainability effects of the LDF can be assessed. Together, the objectives can be considered to be the 'framework' for the appraisal. A related aim of the evidence gathering stage is to gather information about the current and likely future baseline situation in the District in order to aid the assessment of effects against these sustainability objectives.
- 2.1.2 The **framework and evidence base** for the SA of the LDF are documented in a Scoping Report, which was completed in April 2005. To take account of changes in policy since then, particularly the publication of the South East Plan Panel Report, an addendum to the Scoping Report was prepared in December 2007.³ A brief overview of the key findings from the Scoping Report and Scoping Report Addendum is presented below.
- 2.1.3 Furthermore, set out below are brief summaries of the sustainability implications of further evidence that has become available since the publication of the addendum to the Scoping Report was prepared in December 2007 (particularly the Secretary of State's Proposed Changes to the South East Plan, 2008).

2.2 A1 – Context Review

- 2.2.1 Stage A1 of the scoping process involves establishing the context in which the LDF is being prepared, i.e. the other policies, plans, programmes, strategies and initiatives that influence the content of the LDF (and vice-versa) and the opportunities and challenges they present. Establishing the sustainability context in Dover District helps to provide a basis for predicting and evaluating effects and helps to identify sustainability problems (see SA Stage A3 below).
- 2.2.2 The requirement to undertake a context review arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"

and

"the environmental protection objectives, established at international, Community or Member State 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"

(Annex 1(a) and (e))

³ The Scoping Report and Addendum are available online @ <http://www.dover.gov.uk/localplanreview/sustainability> (accessed 01/09)

- 2.2.3 In preparing the Core Strategy the Council the council have had to pay particular attention to ensuring conformity with the emerging South East Plan, as well as reflecting the aspirations of the Dover District Council Community Strategy. A range of other policies, plans etc. are also relevant.

The South East Plan

- 2.2.4 The South East Plan is intended to provide a vision for the future of the region to 2026. The draft plan was submitted to Government in March 2006 and, following consultation, was subject to an Examination in Public (EiP) between November 2006 and March 2007. The report of the Panel overseeing the EiP published its recommendations for changes to the plan in August 2007. In light of the Panel Report the Government Office for the South East published the Secretary of State's Proposed Changes to the South East Plan, which were open for consultation until the 24th October 2008.
- 2.2.5 The draft South East Plan (2006), proposed that Dover District accommodate 6,100 new homes between 2006–26. The Panel Report recommended that Dover District's housing allocation be increased to 8,100 new homes and that the majority of these should be located at Dover itself.
- 2.2.6 The Secretary of States Proposed Changes to the South East Plan (2008) identifies Dover as a 'regional hub' and a Growth Point. The Core Strategy needs to be aligned with the following RSS policy requirements:
- Provide for a minimum of **10,100 new homes (by 2026), concentrated at Dover**
 - Develop Dover's international gateway and regional hub functions, including appropriate Port development to support growth in traffic
 - Exploit the potential of the high speed rail service from 2009
 - Diversify and enlarge research and manufacturing, focused at Dover and the Sandwich/Richborough area
 - Promote new higher and further education at Dover
 - Complete the regeneration of the former coalfields
 - Develop Deal's local service functions and mixed employment consistent with the town's scale and character
 - Develop conservation and enhancement of coastal wildlife habitat, especially wetlands in the Lower Stour area
 - Promote active pre-planning to facilitate infrastructure and development delivery

Dover District Community Strategy

- 2.2.7 The Dover District Community Strategy 2003-2010 includes a vision that *"By 2010, our District will be one in which everyone can have pride"*. To achieve the vision, the Strategy sets out four key themes under which priorities and targets are developed:
- *Community* - To meet social needs, reduce crime and the fear of crime and create a healthy district in which both the individual and the community realise their potential
 - *Opportunity and Access* - To provide opportunity and access for all individuals to all goods and services and enable business to deliver those goods and services where needed
 - *Regeneration* - To create a district where opportunities meet the aspirations of an appropriately trained and motivated workforce.

- *Environment* - A district where consideration for the care and long term future of our surroundings, natural and man made is part of everyday life and decision making, ensuring that the district is a healthy and attractive place to live.

Other policies, plans, programmes, strategies and initiatives

- 2.2.8 The draft South East Plan, Panel Report, Proposed Changes and the Dover District Community Strategy were reviewed as part of a wider review of the policies, plans, programmes, strategies and initiatives considered relevant to the LDF. Another key document with particularly strong implications for the LDF is the Kent and Medway Structure Plan (2006). Some of the key messages to emerge from the review are set out in **Table 2**.

Table 2: Key messages for the LDF identified in the Scoping Report and Addendum

The LDF should seek to...
Conserve and enhance biodiversity. In particular, the LDF should seek to protect all statutory nature conservation sites as well as focusing on biodiversity in the wider environment, connectivity and the provision of new habitats.
Reduce car dependence by facilitating more walking and cycling and improving public transport linkages
'Green' residential developments and ensure sufficient open space provision
Incorporate waste strategies into new developments and encourage further re-use, recycling and recovery of waste
Ensure that jobs, shopping, leisure facilities and services are accessible by public transport
Protect the historic environment and secure increased access where appropriate
Protect open space and sports and recreational facilities of high quality / value to the local community
Protect stretches of Heritage Coast and prohibit unnecessary coastal development
Ensure that local communities have access to a range of shopping, leisure and local services
Regenerate deprived areas
Increase the density of development and avoid developments with less than 30 dwellings per hectare net
Prioritise the development of previously developed (brownfield) sites
Conserve the natural beauty of Areas of Outstanding Natural Beauty (AONBs)
Develop renewable energy sources and incorporate renewable energy projects in new developments. Contribute to Kent-wide targets for renewable energy
Support a more local, small scale and dispersed pattern of generation
Encourage high value added activities and promote cluster activities (e.g. pharmaceutical research)
Improve road access (particularly A2 and A20)
Enhance the role of Dover port and restore the port's rail connection
Upgrade tourism facilities, promote diversity and reduce seasonality
Endeavour to reduce greenhouse gas emissions and adapt to climate changes already underway

The LDF should seek to...

Include policies to promote better public health (e.g. through walking and cycling initiatives)

Encourage developments that 'design out' crime and reduce fear of crime

More recent policy context

- 2.2.9 The policy evidence base has been added to considerably since the publication of the addendum to the Scoping Report in December 2007. Summarised in **Table 3** are some of the key implications from recent policy documents.

Table 3: Implications of post December 2007 policy context

National Growth Point Status

Growth Point Status has opened up the potential for Dover to access a number of Central Government funding streams, including the Growth Point Delivery Fund, The Community Infrastructure Fund and the Regional Infrastructure Fund. Funds, if secured, will be used to upgrade electricity supply at Whitfield, create a land bridge in Dover, create a link between the A2 and A256 north of Whitfield, fund an express bus service from Whitfield to Dover and implement wider transport improvements to promote walking and cycling in Dover.

Strategic Housing Market Assessment

As a generalisation, the District's housing stock does not offer sufficient choice to meet current needs in terms of affordability, type and size and quality. While affordability issues are not as extreme as many other parts of the region they are, nonetheless very significant and growing. Affordability issues affect all parts of the District but the Sandwich area has the highest level of unmet need.

The District, and especially Dover, contains significantly more terraced housing than the regional average, much of which is private pre-1920s and associated with poor condition. There is also a much higher than average amount of homes that are long-term vacant. The stock is not sufficiently suited or adaptable to the needs of the elderly and those with health problems. The evidence also indicates that there is not enough housing at the high end of the market that appeals to working age people moving into the area.

Volume house builders have not, until recently, been attracted to the District due to the weaker market conditions and a lack of large development sites. Recent years to 2008 have seen increases in the rate of new house completions and some larger development sites have become available, accompanied by greater interest and activity from large housebuilding companies. There are great differences in the housing market within the District, especially between Dover and the north of the District where there is a much more positive market perception and average house prices can be double.

The Dover District Water Cycle Strategy

This study examines whether sufficient water resources are available to supply forecast demand, how much growth the existing drainage and wastewater treatment works (WwTW) can accommodate, and whether or not the streams, rivers, and coastal waters in the area have sufficient capacity to meet any additional discharges, or varied discharge concentrations without water quality deteriorating.

Dover District is located in the Agency's Stour Catchment Abstraction Management Strategy, which

identifies that all the groundwater sources are over-abstracted. This means that the Agency is unlikely to permit any increase in licensed abstraction volumes for both water companies. Folkestone and Dover Water has been awarded Water Scarcity Status, reflecting the pressure on water resources in the region, and enabling it to enforce compulsory water metering across the majority of its customers. Future demand must therefore be met by increasing water efficiency. The water companies have advised that meeting future demand will not constrain development, however the pressure on the water environment and competing demand for supply will depend on the actual per capita consumption figures achieved through water efficiency measures.

Currently, developers are not legally obliged to build homes incorporating water efficient design, although socially funded housing is now designed to CSH level 3 / 4 (equating to 105l/h/d). It is **recommended that Dover District Council implements a policy for all homes to comply with CSH Level 3 / 4 to assist in the implementation of water efficiency.**

The baseline assessment of routine water quality monitoring data across the district demonstrates that whilst the River Dour catchment has good water quality, data for the lower reaches of the River Stour illustrates the poor water quality, both in recent years and historically. The main issue, as is the case for many rivers particularly in southern and eastern England, are the elevated nutrient concentrations (nitrates and phosphates). The main failures in chemistry along the Little Stour and the Wingham could partly be attributed to wastewater and private discharges, but it is also important to note that diffuse sources, and particularly runoff from agricultural land, as well as urban areas, contribute (to a greater or lesser extent) to these failures.

Forecast flows to wastewater treatment works (WwTW) from proposed growth targets will not provide a constraint for development. However, the capacity of the sewerage network potentially poses a constraint as new and extensions of sewers will be required to meet certain development needs, particularly for development at Whitfield. These will generally be funded through the regulatory mechanism. The capacity of individual treatment works and the feasibility of conveying additional wastewater flows to the works should be a key consideration when choosing the location of large development sites.

Green Infrastructure Strategy

The Green Infrastructure Strategy being developed for the District identifies that the key areas of the District, where conservation is a priority and is likely to act as a significant constraint to other land-uses are:

- The low, wetland areas associated with the north of the District (to the North of Deal and to the North, East and West of Sandwich)
- The coastal area between Deal and Dover
- The North Kent Downs to the west of Dover

The Green Infrastructure Strategy also identifies three east / west networks of habitat patches that should be reinforced and also promotes more active management of the River Dour.

Core Strategy Evidence Base - Sustainable Construction and Renewable Energy

This evidence base study made a range of policy suggestions, including:

All new developments are required to meet Code for Sustainable Homes standards or equivalent. New developments are required to meet Code level 3 with immediate effect (from granting of permission), at least Code level 4 from 1st April 2013 and at least Code level 5 from 1st April 2016. All new non-residential developments over 1000m² gross are required to meet BREEAM Very Good or equivalent with

immediate effect (relevant versions cover offices, retail, industrial, education and healthcare). More information and supporting guidance will be provided with the Development Contributions SPD.

For new developments that cannot meet the carbon and water reduction targets in DM3 onsite and for new non-residential developments of less than 1000m² gross, applicants must achieve commensurate energy and water savings elsewhere in Dover District. The actions or sums paid must achieve the difference between the onsite performance of the development and the immediate, 2013 and 2016 energy and water standards expected for developments. Dover District will publish updates concerning details of the energy and water efficiency schemes that will be eligible and the cost per tonne of CO² and per m³ of water saved. Applicants must prove they cannot meet requirements onsite through an open book accounting approach to show the development would not go ahead.

Funding levels will need to be set to reflect District needs and priorities to reduce energy and water use. This will be informed by Regional renewable energy targets; the Government definition of zero carbon and related list of allowable solutions; and local initiatives to improve existing residential and non-residential buildings.

Whitfield

- a) Whitfield will achieve at least Code for Sustainable Homes level 4, aspiring towards level 5 with immediate effect.
- b) Schools within Whitfield will be zero carbon and meet BREEAM Excellent.

Revisions to existing policy:

Policy (i) should now read: 'A comprehensive Masterplan, energy strategy and water strategy is agreed by the Council in advance of the determination of any planning applications and all applications accord with it. The Masterplan/SPD will test and define exact levels of achievement, particularly with regard to the delivery of heat and water recycling requirements and the balance between onsite and offsite provision of carbon savings.'

Wellington Dock

- a) Wellington Dock will include a district heating system.
- b) Non-residential buildings will meet BREEAM Excellent.
- c) At least 75% of the sound insulation credits must be achieved using the Code for Sustainable Homes.

Connaught Barracks

- a) Connaught Barracks will include a district heating system, which must be sensitively integrated within the site.
- b) At least 80% of the ecology credits will be achieved using the Code for Sustainable Homes and BREEAM assessments.

Mid Town

- a) Mid Town will include a district heating system and individual buildings will provide heat network connections.
- b) Non-residential buildings will meet BREEAM Excellent.
- c) At least 75% of the sound insulation credits must be achieved using the Code for Sustainable Homes.

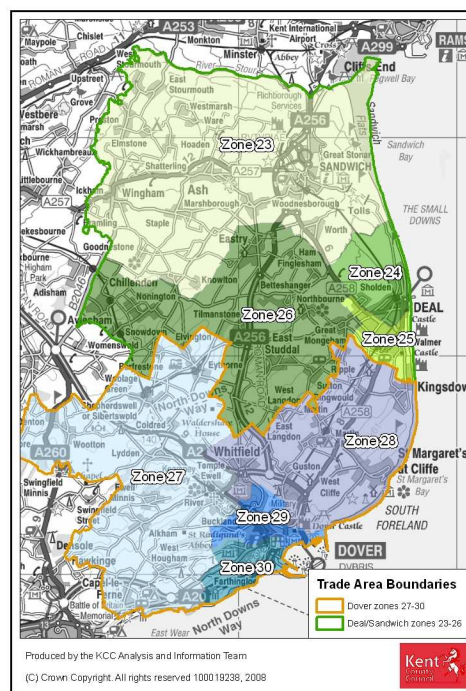
Update to the Retail Need Assessment Study, 2008

In 2007 Dover District attracted £117.5 million of expenditure on convenience goods. It is predicted that the high growth strategy will lead to residual expenditure in 2026 would total £44 million (a low growth option would have led to an increase of £19.1 million).

For comparison goods, £115.6 million is attracted to the shops in the Dover District in 2007. It is predicted that the high growth strategy will lead to residual expenditure in 2026 would total £262.5 million (a low growth option would have led to an increase of £105.2 million).

Where growth is anticipated will have a bearing on where the increase in retail need is generated. Two main retail zones – Dover, and Deal/Sandwich (see map) – have been defined.

The projection capacity for retail need shows the amount of floor space required up to this point for comparison goods for Dover district is approximately 22,000 sq m gross and up to 2,950 sq m gross for convenience goods before. The majority of the required need is located within the trade area of Dover.



Beyond 2016, the impact of the population increase will begin to take effect on retail need. By 2026 retail need for convenience goods in the district will be double (130%) the amount of floor space that would have been required by a low growth scenario. For comparison goods, a high growth scenario will generate approximately a third more (39%) floor space than would have been the case under a low growth option.

The trade area which covers the towns of Deal and Sandwich has a smaller requirement for retail floor space than Dover. For comparison goods, the amount of floor space required to 2026 is 19,200 sq m gross (57% more than would have been required under a low growth option).

Dover District Council Economic Review, 2008 (Roger Tym)

This study rolls forward the economic forecasts for the District from 2016 to 2026. It concludes that, if Dover District's economy continues to grow along the same trajectory as currently, then there would be an expected employment increase of 5,000 jobs between 2006 and 2026. However, more likely is that there will be a step-change in the future of Dover District's economy. Overall, it is therefore predicted that labour demand will grow by 6,560 jobs between 2006 and 2026. This is thought to be a conservative estimate as it does not take account of the potential for CTRL to be a further boost to the local economy.

2.3 A2 – Baseline

2.3.1 The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems (see SA Stage A3 below).

2.3.2 The SEA Directive's requirements in relation to baseline information are:

The 'Environmental Report' required under the SEA Directive should include:

"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"

"the environmental characteristics of areas likely to be significantly affected"

(Annex 1(b) and (c))

2.3.3 Baseline information was collected for the Scoping Report and addendum to the scoping report. Set out below is a summary of this information, which also takes account of the most recent understanding of those elements of the sustainability baseline that are now seen to be most relevant to the plan (i.e. the baseline that is most likely to be affected). This baseline review should be read alongside the baseline information set out in the Submission Core Strategy.

2.3.4 This section provides:

- an introduction to the District's economy, community and environment;
- a brief analysis of how the District might look in the absence of the Core Strategy and Site Allocations Document; and
- a focus on the characteristics of those areas likely to be most affected, particularly those areas likely to be affected by the significant changes to the Core Strategy (since preferred options) as set out in the Submission Core Strategy Document.

Dover District⁴

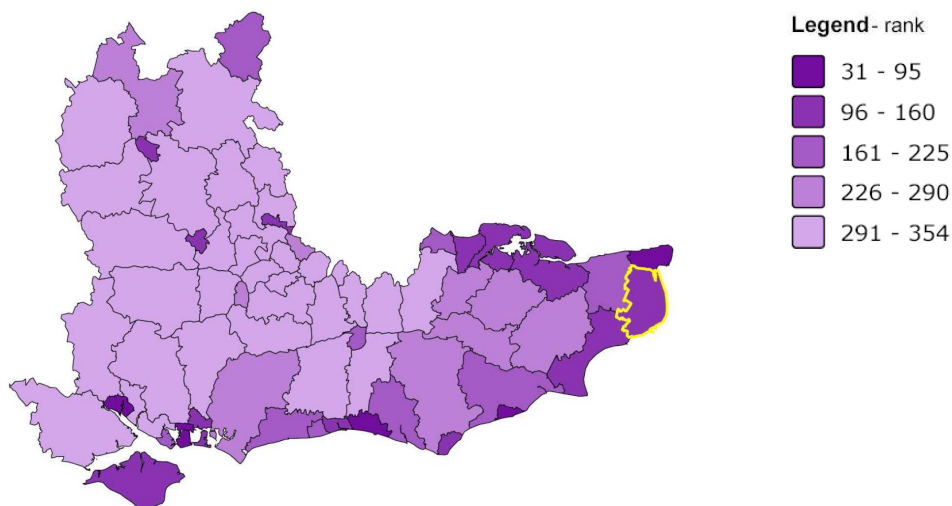
2.3.5 Dover District covers 123 square miles and its population, based on the 2001 Census, stands at 104,566. Dover and Deal, the two largest urban areas, have populations of 32,598 and 28,768, respectively.

2.3.6 In relation to the **economy**, in 2006, 73.4% of Dover District's working age population was in employment, higher than in neighbouring Thanet and similar to levels in Canterbury and Maidstone Districts. In 2004, Dover District was home to 2,460 VAT registered businesses although this represented a slight decline on the figure for the previous year and contrasts with Canterbury which saw a 2.5% increase in the number of businesses between 2003–4. In 2003/04, 73% of young people in Dover District (16–24 year olds) were in full-time education or employment; however, this was considerably lower than figures for Canterbury (88.5%) and Maidstone (92.9%).

⁴ The information in this section is taken from the Dover District Council website and the Audit Commission website where an area profile of Dover can be accessed www.areaprofiles.audit-commission.gov.uk/.

- 2.3.7 In terms of education, in 2006 14.8% of Dover District's population had no qualification, which is considerably higher than the average for the South East (9.6%). Furthermore, far fewer people in Dover District are educated to NVQ level 4 and above (15.1%), in comparison to the regional average (30.5%)⁵.
- 2.3.8 Dover District ranks as the 153rd most deprived district in the country in terms of average multiple deprivation (see **Figure 2**). Dover District compares very poorly in comparison to the wider South East. Focusing in on Kent, Dover District performs considerably better than Thanet, worse than Canterbury and similarly to Shepway and the other authorities on the North Kent Coast. It is important to remember that this average score will mask spatial variation in multiple deprivation within the District.

Figure 2: National rank of average multiple deprivation by local authority (IMD 2007)



- 2.3.9 In 2006, 15.6% of Dover District's working age population claimed key state benefits, significantly higher than figures for Canterbury and Maidstone (11.7% and 10.1%, respectively). In addition, in 2004, 21.4% of children in Dover District lived in families that were income deprived (comparing unfavourably with 14.2% in Maidstone for example). In 2006, 11.3% of the District's housing was deemed 'unfit', a high figure compared with neighbouring areas – see **Table 4**.

Table 4: Unfit housing

District	Percentage of housing which is unfit
Dover	11.3%
Shepway	9.9%
Thanet	7.6%
Maidstone	3.3%
Canterbury	3.1%

⁵ Taken from www.nomisweb.co.uk

- 2.3.10 In relation to the **community**, in terms of improving the local area, in 2003 / 04 Dover District's residents prioritised, firstly, providing activities for teenagers, secondly, reducing crime and, thirdly, improving roads and pavements. In relation to crime, 64.3% of the District's residents feel fairly safe or very safe outside after dark. The District has a relatively low incidence of burglaries – 6.33 per 1000 households in contrast to Thanet with 17.55. Violent crime is also lower than in neighbouring Thanet.
- 2.3.11 In terms of housing affordability, the house price to income ratio in Dover District stood at 4.76 in 2004, lower than Canterbury at 5.30 but high nonetheless.
- 2.3.12 The quality of the natural **environment** is high. The diverse landscape gives rise to a wide and contrasting range of wildlife habitats, some of which are of international national importance (2,211 hectares in the District out of a total 31,892 hectares is designated as Site of Special Scientific Interest). Much of the District's downland is an Area of Outstanding Natural Beauty and coastal parts are also Heritage Coast. The district has a rich heritage, particularly in terms of military history, which adds to the character of towns and landscapes.
- 2.3.13 However, Dover District has a significant amount of derelict land – 7.6% of the total land area in 2004 (Canterbury has none). In addition, 24% of land and highways have unacceptable levels of litter and detritus and only 44% of rivers in Dover District have been assessed as having good biological quality. The proportion of household waste recycled in Dover District is low at 11.24% (contrast Canterbury where 26.42% of household waste is recycled).

The 'future baseline' *without the plan* - the 'business-as-usual' scenario

Economic and social change

- 2.3.14 From a low point in the 1980s and early 1990s the District has seen steady economic growth in recent years. The 2008 Economic Review has shown that business confidence is high and that there are very good prospects for continued employment growth. Growth will be supported by the significant improvements to the District's rail services when Dover becomes served by domestic services on the new high-speed Channel Tunnel Rail Link (CTRL). This improved accessibility – travel time to London could be up to 40 minutes faster than at present - is likely to stimulate investor interest in the District, especially in the residential market. This is likely to lead to increased house prices and exacerbate existing affordability problems.
- 2.3.15 Other works coming forward in Dover District in the near future include:
- Phase 2 and Phase 3 of the White Cliffs Business Park;
 - Town centre redevelopment in the St. James's area has been permitted subject to resolution of conditions;
 - The Learning and Skills Council is committed to providing new facilities for South Kent College;
 - Dover Harbour Board is proposing a new ferry terminal at the Western Docks and redevelopment of the Wellington Dock area; and
 - PCT / EKHT have identified Dover Mid Town as the preferred location for a new community hospital.
- 2.3.16 However, it is important to consider the fact that the economic downturn will have major implications for the ability to deliver housing and attract investment in Dover District for a number

of years. Furthermore, continued growth under a business as usual scenario could be hindered by several factors, not least the shortage of skilled labour in the District. The often poor quality of Dover's housing stock could also act as a barrier to attracting skilled people to the District. Under a business-as-usual scenario, growth in the District's economy will also be hindered by a fall in the number of people of working age. It is predicted that Dover District's population will fall and that the existing population will continue to age. An increasing proportion of elderly people will present a range of challenges, particularly in relation to healthcare and accessibility.

- 2.3.17 Under a business-as-usual scenario, Dover District might also slip further behind neighbouring areas. The district is close to the national growth areas of Ashford and Kent Thames Gateway where major employment and population growth is planned. Dover town centre already competes with the neighbouring centres of Folkestone, Ashford, Westwood Cross and, in particular, Canterbury. In recent years these centres have been improving at a faster rate than Dover and Deal and attract a lot of the District's residents, especially for non-food shopping and leisure.

Environmental change

- 2.3.18 Freight traffic through the District is forecast to increase greatly as a result of increased international trade. This forecast has lead Dover harbour board to propose a new ferry terminal at Dover Western Docks. This is set to become the second busiest such terminal in the country – after Dover Eastern Docks. Increased traffic growth is likely to lead to poorer local air quality and increased greenhouse gas emissions, the latter being the cause of climate change. However, EU Directive 2005/33/EC on the sulphur content of marine fuels limits the maximum level of sulphur in diesel sold within the EU to 1.5% from 2010 onwards, down from 4.5% at present. So 'business as usual' will be for a reduction in per-km sulphur emissions from shipping.
- 2.3.19 For the UK, climate change means hotter, drier summers (more heat waves), milder wetter winters, higher sea levels and an increased risk of flooding to coastal areas. The District is therefore particularly vulnerable to the effects of climate change. In addition, hotter and drier summers are likely to place a further strain on water resources; Folkestone and Dover Water became the first company to get approval for compulsory water metering in 2006 following periods of low rainfall. Importantly, the impacts of climate change could be disproportionately felt by the most vulnerable people in the District, particularly the elderly. It is important to recognise that natural habitats will migrate as the climate changes. The District's built environment will also be affected by climate change and infrastructure will need to be increasingly adapted to cope with a changing climate.

Areas in the District likely to be significantly affected by the plan

- 2.3.20 The area most likely to be affected by the significant changes that have been made to the plan since the preferred options stage is Dover, and Whitfield in particular. Furthermore, it is important to consider the Deal baseline, as the Submission Core Strategy leaves open the possibility that further growth could be directed to Deal, pending the results of an Area Action Plan.

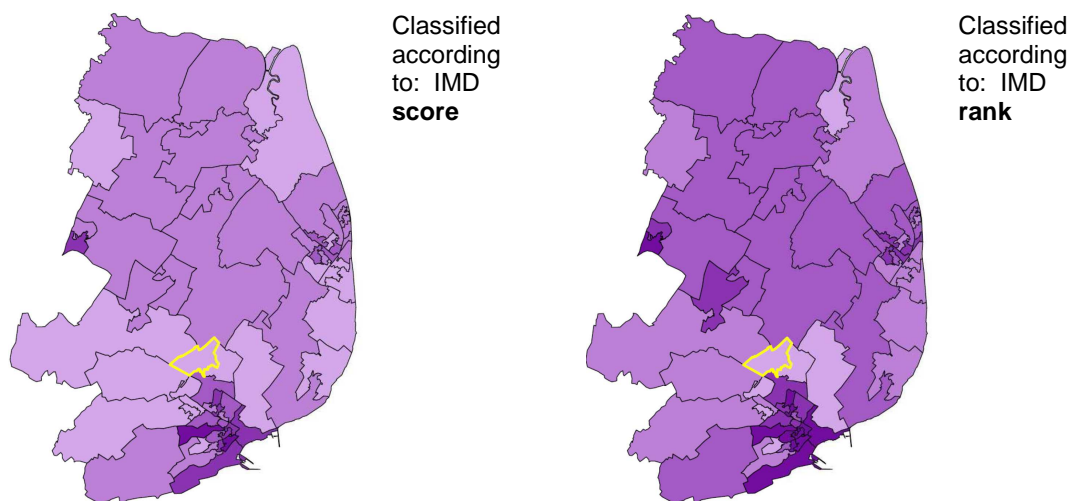
Dover

- 2.3.21 Dover is the District's principal town, the major employment base, an international gateway and transport centre, and is renowned for its dramatic landscape setting between the White Cliffs.

Dover itself is relatively deprived with a high proportion of its wards experiencing multiple deprivation. The town's population is declining and the choice of housing stock is narrow, skewed towards terraced housing with a significant proportion in poor condition. The town centre has a restricted range of facilities and is not well used by local people. Furthermore, the quality of the public realm needs improving and there is an identifiable lack of modern buildings. Some large-scale out-of-centre shops serve wider needs and help to retain custom in the District, but do not benefit the centre.

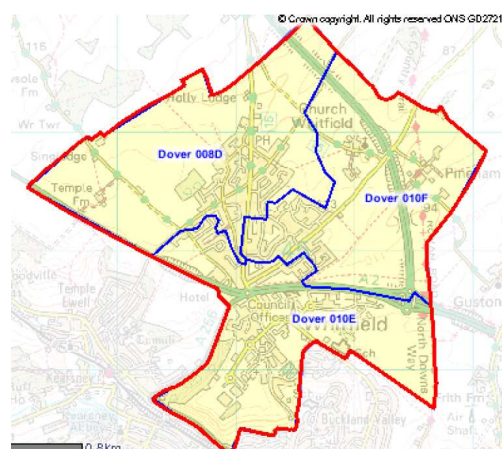
- 2.3.22 **Figure 3** shows the variation in multiple deprivation within Dover District classified according to both score and rank. It is useful to show both classifications as the way that the data is classified affects the way that trends in the data are represented on the map. It can be seen clearly that multiple deprivation is focused in Dover.

Figure 3: Multiple deprivation in Dover District by Super Output Area



- 2.3.23 Highlighted in the map is Super Output Area (SOA) 008D. This is one of the three SOAs that make up **Whitfield Parish** (see **Figure 4**). It is important to consider the sustainability baseline associated with the Parish, as this is the area that is most likely to be affected by the changes set out in the Submission Core Strategy. **Figure 3** shows that SOAs 008D and 010F are amongst the least deprived in Dover. SOA 010E, which includes the part of Whitfield Parish that extends south of the A2, suffers from considerably higher deprivation, but is still outside the top 25% of Dover District's SOAs in terms of multiple deprivation. Whitfield has significantly fewer people claiming Job Seekers Allowance and incapacity benefits than the District average.⁶

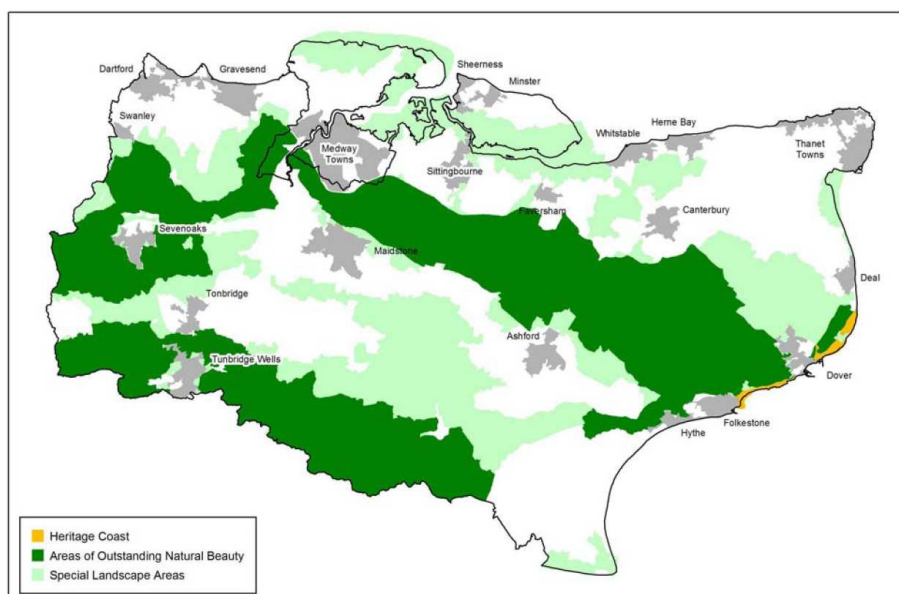
Figure 4: SOAs in Whitfield Parish



⁶ Information sourced from www.nomisweb.co.uk [online] accessed 12/08

- 2.3.24 While the town's location at the point where the Kent Downs, an Area of Outstanding Natural Beauty, meets the sea provides an exceptional and defining setting, the steep topography has resulted in a linear character to the town with development following the bottom of valleys. This has produced a rather long and stretched town centre and also restricts the options for urban expansion. Whitfield, which is situated at the northern extremity of Dover, is outside of the Kent Downs Area of Outstanding Natural Beauty, which runs to the west of Dover. However, the land does fall within the North Kent Downs Special Landscape Area, as identified in the Kent and Medway Structure Plan (2006) – see **Figure 5**. Whilst the AONB boundary runs along the railway line (about 1.5km to the west of Whitfield), between the railway line and the A2 (and less than 1km from Whitfield at its nearest point) are the Lydden and Temple Ewell Downs - a characteristic downland landscape designated as a Special Area of Conservation and National Nature Reserve.

Figure 5: Kent AONBs and Special Landscape Areas



Deal

- 2.3.25 Deal has an attractive seaside residential character. Although served by mainline rail services it is located away from the principle road network and its highway system is relatively constrained. Consequently, commercial activity tends to be small-scale, locally based, and dominated by town centre businesses, short stay tourism and a growing market for golf. Not surprisingly it sees a considerable amount of out-commuting to neighbouring employment centres - especially Dover and the Richborough area. The town centre is characterised by small-scale development on a historic street pattern, which only offers limited scope for expansion, but the centre is nonetheless well thought of by residents. The North Deal area is, however, associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour. This part of Deal is poorly served in terms of youth, health and community facilities and, through its association with the former colliery, has been included into the National Coalfields Programme to aid rejuvenation.

2.3.26 The northern part of Deal, and the countryside between Deal and Sandwich, is subject to the risk of tidal flooding which places a constraint on development. Also, much of the countryside is environmentally sensitive, with areas that are of international importance in terms of biodiversity. The area between Deal and Sandwich is known as the Sandwich Flats and the Lydden Valley. These marshlands continue inland, north of Sandwich, where they follow the former mouth of the River Stour and the reclaimed and silted up course of the Wantsum Channel. Together, these marshlands make up the 'Wantsum and Lower Stour Marshes' character area, as defined by the Kent Landscape Assessment (2004) – see **Figure 6**. Some of these marshlands are designated as being of national and international importance for biodiversity (see **Figure 7**), and there is considerable potential for re-storing currently agricultural land to more natural wetland habitats. This could potentially be important in terms of adapting to climate change and rising sea levels.

Figure 6: Landscape Character Areas in the vicinity of Deal and Sandwich

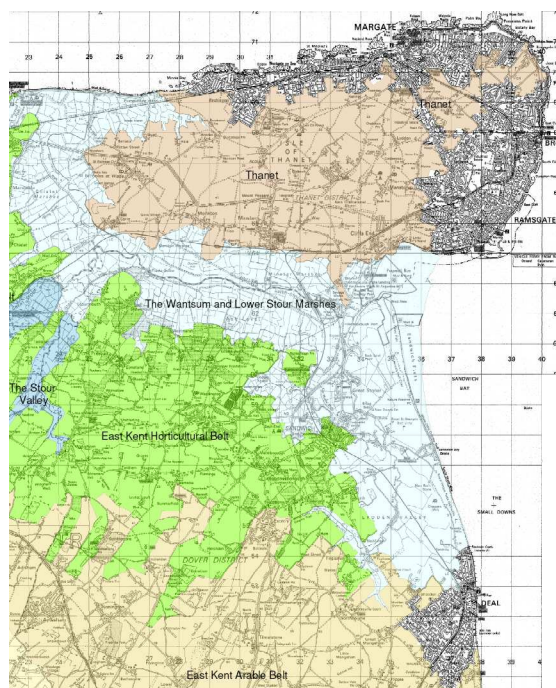


Figure 7: Land designated for biodiversity in the vicinity of Deal and Sandwich



- 2.3.27 It is notable that Policy EKA7 (Integrated Coastal Management and Natural Park) of the Secretary of State's Proposed Changes to the South East Plan (2008) states that:

"The lower catchment of the River Stour between Deal, Sandwich and south Ramsgate and parts of the former Wantsum Channel include protected wetland and other habitats that are fragmented. There is potential in this area to:

- *Create new natural habitats as alternatives to agriculture on marginal land*
- *Improve visitor facilities and access*
- *Create a tourist attraction"*

Sandwich

- 2.3.28 Sandwich is a historic Cinque Port and market town on the River Stour, renowned for its medieval street pattern and high concentration of listed buildings. The town centre serves the daily needs of the town itself and neighbouring villages, and is a tourist attraction. Town centre shops are however showing signs of stress due to reducing levels of trade but the centre remains well thought of by residents. The Richborough area to the north of Sandwich is a major employment centre containing a pharmaceuticals research and development complex of international importance, other smaller-scale industry and brownfield areas suitable for commercial redevelopment.
- 2.3.29 The local housing market is strong in Sandwich with high demand and price levels and consequently a higher affordability gap for those in housing need. The town is, however, subject to significant constraints in terms of further development with its road network in particular not capable of accommodating a great deal of additional development. It is set in a predominantly flat landscape much of which is at risk from coastal flooding.

Rural area

- 2.3.30 The District's extensive rural area contains a great diversity of settlements, in terms of character, size and facilities. In common with most rural areas the main concerns revolve around the retention of services and facilities, the level of public transport, the need for more affordable housing for local people and traffic management.
- 2.3.31 The former coal mining areas are undergoing a programme of regeneration. As part of this the village of Aylesham has been identified for expansion in the Kent and Medway Structure Plan and the Dover Local Plan for expansion so that it might perform a role as a rural centre.

2.4 A3 – Sustainability Issues

- 2.4.1 Stage A3 involves drawing on the evidence gathered in Stages A1 and A2 to identify those sustainability issues that are most pressing in didn't have this . The sustainability issues identified then form the basis for developing a robust SA framework (Stage A4). Furthermore, the evidence summarised in the table of sustainability The issues below can provide useful evidence to inform the judgement of effects against the SA framework at the assessment stage.

2.4.2 The requirement to identify sustainability issues arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"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 [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d))

2.4.3 **Table 5** lists the economic, social and environmental problems facing Dover District. This evidence includes findings from the baseline and context reviews.

Table 5: Sustainability issues facing Dover District

Sustainability problem	Supporting evidence
Relative deprivation	<ul style="list-style-type: none"> Index of multiple deprivation shows great spatial variation across the district, with pockets of deprivation that are significant from a national perspective
High unemployment	<ul style="list-style-type: none"> Proportion of working age people in work is relatively low Unemployment in some of the inner urban areas of Dover is significantly higher than the national average
Low educational attainment	<ul style="list-style-type: none"> Percentage of people with qualifications is relatively low
Low level of skills	<ul style="list-style-type: none"> Loss of graduates from the local labour force perceived as a constraint / threat Business would welcome better local training and skills to meet their long-term needs A wider range of vocational training should be provided, with the emphasis on practical skills that will be in demand in the local economy Proportion of adults with poor literacy and numeracy skills is relatively high Proportion of people qualified to degree level or higher is relatively low
Poor Higher Education provision	<ul style="list-style-type: none"> The expansion of the South Kent College should be facilitated
Low levels of economic activity	<ul style="list-style-type: none"> New business formation rate is relatively low
An unbalanced economy	<ul style="list-style-type: none"> There is a large amount of relatively low skilled employment in port related activities The high value knowledge driven economy is also relatively strong, particularly the pharmaceuticals sector However, there is a noticeable shortfall of people working in more middle value skilled and professional occupations
Shortage of outside investment	<ul style="list-style-type: none"> Other Growth Areas in the South East compete for investment East Kent attracts limited inward investment activity in relation to North and West Kent

Shortage of readily available employment land	<ul style="list-style-type: none"> There is a large amount of potential land for employment development, but infrastructure and other constraints have often meant that this is not readily available for development.
Poor retail facilities	<ul style="list-style-type: none"> Although the main shopping centre within the District, the calibre of development and facilities in Dover is poor with little modern development, low rental values and limited growth. Superior shopping facilities at Canterbury, Westwood Cross, and Ashford lie within 20 minutes by car
Poor office accommodation	<ul style="list-style-type: none"> The stock of office accommodation in the town is poor, comprising older buildings or converted residential buildings, often with little or no parking provision
Tourism potential in the district is not being achieved	<ul style="list-style-type: none"> There is a relatively low level of tourist activity in Dover despite the very high volumes of tourists who travel through the port
Environmental constraints on development in Dover town	<ul style="list-style-type: none"> Housing provision in Dover is subject to strong topographical and landscape (AONB) constraints
Relatively poor transport access	<ul style="list-style-type: none"> Dover is 'not a joined-up town' - The port is split either side of the town centre, Townwall Street (A20) separates the town centre from the seafront, Dover Castle is isolated from the town centre and the more recent development of the Whitfield area is relatively distant from the town centre There is a large amount of freight and passenger traffic that requires strategic access to the port, with congestion being exacerbated by the single carriageway stretch of the A2 Bus services within Dover town are very poor partly as a result of the spine and branch road network within the restricting pattern of the tributary valleys There is currently a slow train service to London
High levels of trips out of the District	<ul style="list-style-type: none"> The district is relatively balanced in terms of people commuting in and out for employment However, there is a noticeable trend for people to travel out of the district to access leisure and shopping
Poor perception of the District by residents	<ul style="list-style-type: none"> Low aspirations and negative attitudes evident in Dover
Perceived crime and anti-social behaviour	<ul style="list-style-type: none"> Continuing fear of crime perceived as a constraint / threat Certain wards suffer disproportionate amounts of crime
Housing provision	<ul style="list-style-type: none"> Increased requirement by RSS for housing in the district (South East Plan – Panel Report)
Shortage of affordable housing	<ul style="list-style-type: none"> Land for housing may in many cases be too small to trigger Section 106 agreements on affordable housing provision Faster journey times on the CTRL may lead to increased property prices in Dover The average household size has declined and will continue to do so, which requires commensurately more housing units Homelessness is relatively high

Health inequalities	<ul style="list-style-type: none"> • Average life expectancy is relatively low • Percentage of people describing their health as good is relatively low
Relatively poor access	<ul style="list-style-type: none"> • Access to services is an issue, with the topography of Dover and limited public transport both acting to increase the isolation of communities and individuals • Rural communities will often be relatively isolated, having to rely heavily on the private car to access services and facilities
Number of unfit dwellings	<ul style="list-style-type: none"> • The percentage of dwellings that are unfit is significantly higher than neighbouring authorities • There are extensive areas of poor quality private housing particularly in the inner urban areas of Dover
Relatively unhealthy lifestyles	<ul style="list-style-type: none"> • Associated Health Action Zones were designated in Thames Gateway, Thanet and Dover District to promote healthy lifestyles
Road accident casualties	<ul style="list-style-type: none"> • A target for a 20% reduction in child road casualties in Ashford, Dover and Gravesend was set in the Kent Community Strategy
Fuel poverty	<ul style="list-style-type: none"> • A high proportion of households have no central heating
Sea level rise and coastal flood risk	<ul style="list-style-type: none"> • Low lying areas susceptible to coastal flood inundation should have strict development controls, particularly between North Deal and Sandwich • The anticipated enhanced sea level rise and increased storminess must be taken into account in all aspects of shoreline forward planning
Climate change	<ul style="list-style-type: none"> • The coastal location of the District in the extreme south east of the country means that it will have to take particular account of rising sea levels, drier summers and shorter periods of heavier rain. • Climate change has the potential to disproportionately impact some groups of people in the District.
High and increasing pressure on water resources	<ul style="list-style-type: none"> • There are increasing pressures on water resources • The Environment Agency has identified the River Dour as impacted by licensed abstractions • The influx of visitors to East Kent during the summer raises the peak demand for water • The difference between average and peak demand could get greater with climate change, as drier summers are predicted
Significant amounts of brownfield land	<ul style="list-style-type: none"> • Particularly associated with the former coalfields.
Habitat loss and fragmentation	<ul style="list-style-type: none"> • Population of wild birds indicator performing poorly
Threats to the landscape	<ul style="list-style-type: none"> • Intensive agriculture and forestry practices together with other development pressures are threatening landscape value in the Kent Downs AONB • Proportion of total area that is derelict land and buildings is relatively high

Environmental Constraints	<ul style="list-style-type: none"> AONBs and Natura 2000 are important constraints that must guide where development can be located in the District (South East Plan – Panel Report) A range of environmental constraints, including flood risk, act in combination in many parts of the district to restrict development as well as access and other infrastructure
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Issues related to European wildlife sites

2.4.4 Five European wildlife sites lie wholly or partly within Dover District (and activities in the District could influence several others):

European wildlife site	Percentage area meeting Natural England Public Service Agreement (PSA) target of being in favourable or 'unfavourable recovering' condition
Dover to Kingsdown Cliffs Special Area of Conservation (SAC)	88%
Lydden and Temple Ewell Downs SAC	100%
Sandwich Bay SAC	The SAC, SPA and Ramsar site all fall within the Sandwich Bay to Hacklinge Marshes SSSI, which has an area of 75% meeting the PSA target.
Thanet Coast and Sandwich Bay Special Protection Area (SPA)	
Thanet Coast and Sandwich Bay Ramsar site	

2.4.5 Issues relating to these sites as well as the potential effects of the Core Strategy and Site Allocations Document on them are discussed in the accompanying 'Habitats Regulations Assessment Report'.

2.5 A4 – Developing the SA Framework

2.5.1 SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. In other words, the objectives provide a methodological yardstick against which to assess the effects of the plan.

2.5.2 The SA objectives were developed primarily by drawing on the sustainability issues identified at Stage A3, but also taking account of other evidence gathered at Stages A1 and A2. **Table 6** below sets out the SA Objectives identified for Dover District. Sub-objectives have also been developed for several of the SA objectives. These sub-objectives should act as prompts to further guide the assessment against the objectives towards consideration of those issues that are likely to be most significant in Dover District.

Table 6: Dover District SA Objectives

1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3. To improve the health and well-being of the population and reduce inequalities in health
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7. To conserve and enhance biodiversity <ul style="list-style-type: none"> - <i>protect internationally and nationally designated sites</i> - <i>protect, enhance and create wildlife habitats</i> - <i>prevent isolation / fragmentation and re-connect / de-fragment habitats</i> - <i>help to meet Biodiversity Action Plan objectives</i> - <i>protect and enhance coastal and marine biodiversity</i>
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment <ul style="list-style-type: none"> - <i>protect landscape and historical designations</i> - <i>retain the character and distinctiveness of the historic and visual environment</i> - <i>maintain and enhance landscape character</i> - <i>reduce noise and maintain / improve tranquillity</i> - <i>protect and enhance the coastal and marine environment</i>
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10. To create a high quality built environment <ul style="list-style-type: none"> - <i>promote locally distinctive design</i> - <i>design out crime</i>
11. To promote sustainable forms of development and sustainable use of natural resources <ul style="list-style-type: none"> - <i>use land efficiently</i> - <i>use of sustainably produced and local products</i> - <i>reduce waste arisings and promote sustainable waste management</i> - <i>reduce energy use, improve energy efficiency and promote renewable energy</i> - <i>promote sustainable water management</i>

12. To encourage high and stable levels of employment and sustain economic competitiveness

- *promote the tourism industry*

13. To improve the development and retention of skills

- *encourage life long learning*
- *develop skills to meet local needs*

14. To ensure that development and benefits everyone in the District

3 The Core Strategy

3.1.1 The statutory spatial development plan for Dover District is called the Local Development Framework (LDF) and is made up of a portfolio of documents, including the Core Strategy DPD (hereafter 'the Core Strategy'). The Core Strategy is the principal document in the LDF and, once adopted, will set out the Council's vision and spatial strategy for the future development of the District. In particular, it will be used to identify land for development of strategic importance to the District. Importantly, the other documents contained in the LDF must be in general conformity with the Core Strategy.

3.1.2 The Council have reached a stage in the development of the Core Strategy where they are, for the first time, able to publish a complete draft version of the plan, known as the Submission Core Strategy document. The main components of the Submission Core Strategy document are:

- The Core Strategy Objectives;
- A description of the overall growth strategy for the District;
- Core Policies - a compact set of policies that are essential to the delivery of the strategy as well as a number of policies relating to strategic allocations, which allocate land for development that is crucial to the implementation of the Growth Strategy and to lay down principles and essential requirements;
- Development Management Policies - a set of more general policies that are needed to support the implementation of the Strategy; and
- Delivery Plan - the programme for implementation, implementation mechanisms, infrastructure requirements, monitoring, intervention and review.

3.1.3 The Core Strategy Objectives, Growth Strategy, Core Policies and Development Management Policies have been developed in an iterative fashion, integrating the findings of SA. As part of this process of plan development the Council, in recognition of the requirements of the SEA Directive have suggested possible alternatives to the preferred options put forward.

3.1.4 The SEA Directive states the following regarding the consideration of plan alternatives:

"Where an environmental assessment is required... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated...". The environmental report should include "an outline of the reasons for selecting the alternatives dealt with".

Article 5(1) and Annex I(h)

3.1.5 This **Submission SA Report** focuses on the appraisal of the significant changes that have been made to the draft Core Strategy since the preferred options stage. The appraisal has focused on the Core Strategy Objectives, Core Policies and Development Management Policies. The growth strategy has not been appraised against the SA framework itself as it is enacted through the Core Policies, each of which has been appraised against the framework. The Delivery Plan has not

been appraised, but rather its implications have been taken into account as part of the wider appraisal.

3.2 The Core Strategy Objectives

- 3.2.1 The Core Strategy Objectives have evolved significantly from the set of objectives that was set out in the Core Strategy Preferred Options documents. Therefore, the Submission Core Strategy Objectives have been reappraised (see **Section 5.2**).

3.3 Growth Strategy

- 3.3.1 Through the process of preparing the Core Strategy the Council has tested four broad growth strategy options for their ability to fulfil the aim and objectives, each characterised by differing levels of housing provision. The options tested were:

- Option 1: Low Growth - 6,100 homes, based on a continuation of trends and the original provision in the draft Regional Spatial Strategy;
- Option 2: Medium Low Growth - 8,100 homes which became a level recommended in the Panel Report to Government;
- Option 3: Medium High Growth - 10,000 homes which is reflected in the minimum requirement set out in the Government's proposed changes to the RSS; and
- Option 4: High Growth - 14,000 homes based around the recommendations of the Dover Regeneration Strategy.

- 3.3.2 The options and an appraisal of their relative merits are set out in the Preferred Options Core Strategy document and its accompanying SA Report. A summary of the growth strategy options is also included in this SA Report.

- 3.3.3 At the preferred options stage Option 3 (medium high growth) was the Council's preferred option. However, the growth strategy has been developed significantly since the preferred options stage, taking account of the changing policy context and additions to the evidence base. The Council have now concluded that **the high growth option is preferred**. This growth strategy consists of the following key features:

- While land for up to 14,000 homes will be allocated the target is to complete a minimum of 10,100 by the end of 2026;
- Realise forecast growth in the local economy including up to 6,500 more jobs;
- Support a forecast population increase of around 15,500 which will increase the potential workforce by some 4,300 people, combined with other measures to increase the proportion of people in work;
- Blunt the strong trend towards fewer children in the population (to around 1,200) and accommodate the ageing process (likely to result in an increase in the number of people over 65 of around 12,500);

- Provide homes that meet the changing needs of the home population but that also attract working age people and families to the District;
- To realise around 60,000 square metres of additional non-food shopping and around 3,000 square metres of food shopping;
- Concentrate these actions at Dover, aimed at enabling a 'transformation';
- Support these actions with the necessary range of infrastructure, including green infrastructure;
- Make better use of historic assets at Dover; and
- Reach higher than national minimum standards regarding use of natural resources and renewable energy

3.3.4 The Growth Strategy also incorporates the following proposals that, as at 2008, had varying degrees of commitment:

- The introduction of a high speed rail service between London and Dover;
- Improvements to Dover Priory Station and town links, three phases;
- The construction of a new ferry terminal at Dover Western Docks ;
- Mixed use redevelopment of Dover Waterfront (centred on Wellington Dock);
- St. James's redevelopment in Dover town centre;
- The renewal of the South Kent College Campus in Dover;
- A new Community Hospital in Dover Mid Town
- Business development main sites at White Cliffs Business Park; Farthingloe, Dover; the Former Collieries at Betteshanger; Minter's Yard, Deal; and Richborough; and
- The expansion and enhancement of Aylesham village.

3.3.5 The Council recognise that the high growth strategy will need to be supported by a considerable level of infrastructure and, not surprisingly, it will be likely to increase risks to the environment (and historic environment), which, where they occur, will need to be avoided, mitigated or compensated in that order of preference.

Reasons for selecting the preferred growth strategy

3.3.6 The Council have chosen to pursue a high growth strategy because they believe it has the best overall alignment with the aim and objectives, the ambitions of Growth Point status and the minimum requirements of the RSS. In particular,

- National policy in PPS12 encourages a long-term view to be taken in Core Strategies that provides a clear indication of direction beyond the stated plan period. A longer-term view can provide greater certainty for communities and for investors, particularly in relation to infrastructure issues

- The higher amount of housing has a greater capability to address the issues facing the District
- It provides greater flexibility - while land for up to 14,000 homes will be allocated the target is to complete a minimum of 10,100 by the end of 2026, consistent with the emerging Regional Spatial Strategy. Should the market wish to take these up at a faster rate, or the Regional Spatial Strategy requirements be reviewed upwards, the local planning framework is in place without the need for a review of the Strategy.

Spatial elements of the growth strategy – where will it happen?

3.3.7 The growth strategy envisages different levels of development in different parts of the District in response to the differing needs and characteristics of these areas. **Figures 8 and 9** show the sources of land required to meet the strategy's housing provisions by District sub-areas.

Figure 8: Proportional distribution of new homes in the District

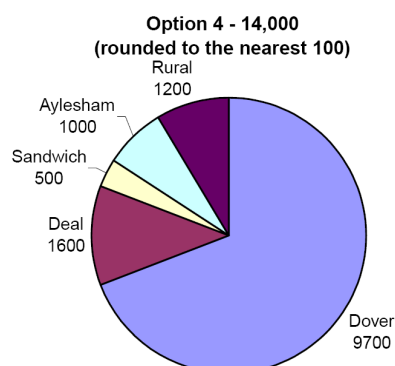
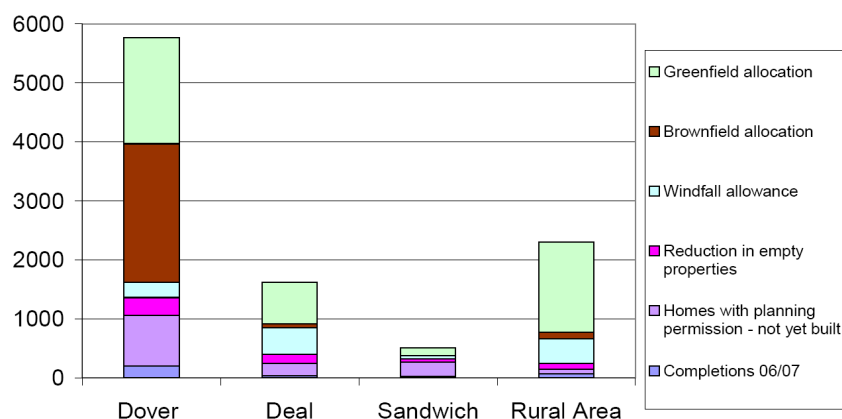


Figure 9: Preferred growth strategy – housing land provision



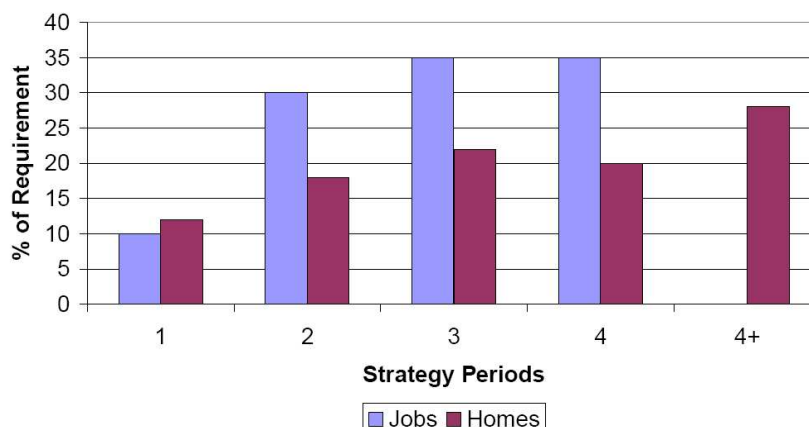
3.3.8 The extra 4,000 houses that the Council will now allocate land for as a result of choosing the 'high growth option' rather than the medium high growth option' will all be allocated to Dover. As

a result the housing allocated to the other 3 areas in the District have not changed since the preferred options stage. The additional 4,000 homes in Dover will be allocated to **Whitfield**.

When will it happen?

- 3.3.9 The Core Strategy Submission document identifies four strategy periods: 2006–2011; 2011–2016; 2016–2021; 2021–2026. For each of the periods the growth strategy identifies – at a conceptual level - what emphasis will be given to delivery of housing and employment, regeneration of Dover Town Centre and infrastructure provision. **Figure 10** indicates the broad percentages of programmed employment and housing growth by five year Strategy periods.

Figure 10: Indicative strategy phasing



3.4 How will the growth strategy happen – the Core Policies

- 3.4.1 The Core Policies are a small set of policies that set out what the Core Strategy seeks to achieve by when and where. The Core Policies also include a small number of proposed developments that are of such scale and significance that they are considered to be fundamental to the success of the Core Strategy and are therefore included within it, rather than the Site Allocations Document. **Table 7** sets out the Submission Core Policies.

Table 7: Final list of submission Core Policies

Development Management Policies
Policy CP1 – Settlement Hierarchy
Policy CP2 – Provision for Jobs and Homes between 2006 – 2026
Policy CP3 – Distribution of housing allocations
Policy CP4 – Housing Quality, Mix, Density and Design
Policy CP5 – Sustainable Construction Standards
Policy CP6 – Infrastructure
Policy CP7 – Green Infrastructure
Policy CP8 – Dover Waterfront

Policy CP9 – Mid Town, Dover
Policy CP10 – Connaught Barracks, Dover
Policy CP11 – The managed expansion of Whitfield

3.5 How will the growth strategy happen – Development Management Policies

- 3.5.1 The Development Management (DM) Policies (see **Table 8**) are those policies against which all proposals for development will be judged. Crucially, they do not merely repeat national policy and guidance, or legislation, but add to or vary it when justified by local circumstances.

Table 8: Final list of submission DM Policies

Development Management Policies
Policy DM1 – Settlement boundaries
Policy DM2 – Protection of Employment Land and Buildings
Policy DM3 – Commercial Buildings in the Rural Area
Policy DM4 – Re-Use or Conversion of Rural Buildings
Policy DM5 – Provision of Affordable Housing
Policy DM6 – Rural Exception Affordable Housing
Policy DM7 – Provision for Gypsies, Travellers and Travelling Showpeople
Policy DM8 – Replacement Dwellings in the Countryside
Policy DM9 – Accommodation for Dependent Relatives
Policy DM10 – Self-contained Temporary Accommodation for Dependent Relatives
Policy DM11 – Location of Development and Managing Travel Demand
Policy DM12 – Road Hierarchy and Development
Policy DM13 – Parking Provision
Policy DM14 – Roadside Services
Policy DM15 – Countryside Character
Policy DM16 – Landscape Character
Policy DM17 – Groundwater Source Protection
Policy DM18 – River Dour
Policy DM19 – Historic Parks and Gardens
Policy DM20 – Shopfronts
Policy DM21 – Security Shutters and Grills
Policy DM22 – Shopping Frontages
Policy DM23 – Local Shops
Policy DM24 – Retention of Rural Shops and Pubs
Policy DM25 – Open Space

4 Appraisal Methodology

4.1.1 This Chapter sets out the methodology for appraisal, as required by the SEA Directive:

The Environment report required under the SEA Directive should 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'

Annex 1 (h)

4.1.2 The appraisal was carried out using the SA framework that was developed and documented in the Scoping Report. The SA framework is provided in **Section 2.5** and consists of 14 objectives against which the Core Strategy Objectives, Core Policies and DM Policies have been appraised.

4.1.3 The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson and Levett-Therivel. However, where possible judgements were made taking into account evidence gathered at the Scoping Stage (as outlined in **Chapter 2**) as well as other evidence that has come to light more recently. The appraisal against the 14 sustainability objectives was also further guided by a number of more specific sub-objectives developed at the Scoping Stage.

4.1.4 The performance of the policies against each objective was given a score according to the criteria set out in **Table 9**. When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

Table 9: Scoring Criteria

Scoring symbol	Meaning
+	Option will result in a significant positive impact on the SA Objective
+?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts
0	Neutral or negligible effect
-?	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts
-	Option will result in a significant negative impact on the SA Objective
?	The relationship between the Option and the SA Objective is unknown, or there is not enough information to make an assessment.

- 4.1.5 The appraisals were documented using a proforma. The proforma included space for commentary on significance and uncertainty of predicted effects, as well as suggestions for mitigation of negative effects and enhancement of positive effects. **Table 10** shows an example of the proforma used for the assessment. The completed proformas are provided in the **Appendices** to this report. **Chapter 6** provides a summary of the main findings.

Table 10: Example assessment proforma

Policy XXX			
SA Objective	Score	Predicted effect (s)	Mitigation
Summary and cumulative impacts:			
Mitigation measures:			

4.2 Difficulties encountered

- 4.2.1 A key issue in undertaking the appraisal of the Core Strategy was the strategic nature of the document and the uncertainty surrounding precisely how its ambitions would be implemented on the ground and the degree to which they would be achieved in practice (particularly since many different partners are involved in its delivery). A key assumption was made that the policies in the Core Strategy would be fully implemented (i.e. they were taken at 'face value'); however, having said this, where tensions between priorities were evident or it appeared clear that full implementation would be problematic, or involve trade-offs, we have done our best to highlight these.

5 Appraisal Findings

5.1 Introduction

5.1.1 This chapter sets out the findings from the appraisal of:

- The Core Strategy Objectives;
- A summary of the growth options appraisal (initially set out in the Preferred Options SA) ; and
- The Core Policies and DM Policies.

5.1.2 The identification of significant effects is a requirement of the SEA Directive:

The SEA Directive requires '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; to be included in the environmental report.

Annex 1f, the SEA Directive

5.1.3 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires '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' to be included in the environmental report.

Annex 1g, the SEA Directive

5.1.4 Mitigation measures are identified in detail in this chapter and then summarised further, and presented alongside proposal for monitoring, in Chapter 7. Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts. Following the consultation on the Submission Core Strategy the Council will make justified responses to these recommendations, also taking account of any comments made by stakeholders during the consultation. The Council's responses can then be considered at the following stage of the plan-making process - the Examination in Public.

5.2 Appraisal of the Core Strategy Objectives

5.2.1 As a result, the significant changes to the Core Strategy Objectives have been appraised. **Table 11** illustrates the results of this appraisal, whilst **Tables 12 and 13** summarise some of the key findings. Government guidance states that:

'It is important for the objectives of the DPD to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA objectives.'
Section 3.3.4, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

Table 11: Objectives Appraisal Matrix

DPD Objectives	SA Objectives													
	Decent and affordable home	Flood risk	Health and well-being	Deprivation and social exclusion	Accessibility	Air pollution	Biodiversity	Countryside and heritage	Sustainable travel	Quality built environment	Sustainable developments	Economy and employment	Skills	Development that benefits all
New objective: Foster population growth particularly in working age families to support forecast growth in the local economy - focused at Dover	?	?	?	?	?	?	?	?	+	0	0	++	+	?
Previous version of objective: Foster population growth and increase the proportion of young people and those of a working age – particularly at Dover - to support forecast growth in the local economy														
New objective: Transform Dover to become a location of choice to live, work, visit, shop and spend leisure time and be a beacon for the District	+	0	++	++	+	?	?	+	+	++	?	++	+	+
Previous version of objective: Transform Dover town from a position of underperformance to a leading role in the District and East Kent – to become a destination of choice to live, work, visit, shop and spend leisure time														

DPD Objectives	SA Objectives													
	Decent and affordable home	Flood risk	Health and well-being	Deprivation and social exclusion	Accessibility	Air pollution	Biodiversity	Countryside and heritage	Sustainable travel	Quality built environment	Sustainable developments	Economy and employment	Skills	Development that benefits all
New objective: Deliver sufficient additional housing to broaden the range and improve the quality and market perception of the District's, and especially Dover's, housing offer and meet the changing needs of the population	+	?	+	+	?	?	?	?	?	++	+	++	+	+
Previous version of objective: Deliver sufficient additional housing to broaden the range and improve the quality and market perception of the District's housing offer														
New objective: Address more localised needs for employment, housing and community facilities at Deal, Sandwich and the rural area	++	?	++	++	+	+	?	?	+	+	?	+	+	++
Previous version of objective: No change														
New objective: Ensure that the local economy performs to or exceeds the County and regional averages	0	0	0	+	0	?	?	?	?	0	0	+	+	?
Previous version of objective: No change														

DPD Objectives	SA Objectives													
	Decent and affordable home	Flood risk	Health and well-being	Deprivation and social exclusion	Accessibility	Air pollution	Biodiversity	Countryside and heritage	Sustainable travel	Quality built environment	Sustainable developments	Economy and employment	Skills	Development that benefits all
New objective: Have no areas falling within the 20% of those most deprived in England	+	0	++	++	+	0	0	0	0	+	?	+	+	+
Previous version of objective: No change														
New objective: Improve residents' skills levels closer to the County averages	0	0	0	+	0	0	0	0	0	0	0	++	++	+
Previous version of objective: No change														
New objective: Improve ease of travel to, from and within the District for both people and freight; concentrate development where it can best align with facilities and reduce the need for travel, especially at the Regional Hub of Dover; encourage walking, cycling and public transport through the provision of new facilities	0	0	0	+	+	?	?	?	+	0	0	++	0	+
Previous version of objective: Improve ease of travel to, from and within the District for both people and freight														

DPD Objectives	SA Objectives													
	Decent and affordable home	Flood risk	Health and well-being	Deprivation and social exclusion	Accessibility	Air pollution	Biodiversity	Countryside and heritage	Sustainable travel	Quality built environment	Sustainable developments	Economy and employment	Skills	Development that benefits all
New objective: Maintain and enhance the District's biodiversity, natural environment inheritance, open spaces and outdoor sport and recreational areas to create a coherent network of green infrastructure that can better support wildlife and human health	0	0	+	0	?	?	++	?	0	?	?	+	0	+
Previous version of objective: To increase the scientific and cultural value of the District's special wildlife and reduce pollution														

Table 12: Summary of Objectives Appraisal

Foster population growth particularly in working age families to support forecast growth in the local economy - focused at Dover

There could be a range of important sustainability implications associated with promoting population growth in an area. For example, population growth could place strain on existing services and facilities so that the existing population finds it more difficult to access such services and facilities. However, any potential negative effects must remain highly uncertain at this stage, as there will be plenty of opportunity to manage population growth to ensure that the baseline sustainability condition in Dover District is not worsened. Furthermore, it is important to bear in mind that population growth promoted by this objective may have the affect of lowering the average age of the population, therefore ensuring that there is less stress on health facilities per capita.

It is recognised that population growth amongst the working age population will be important to ensure that there are employees living locally with the necessary skills to support economic growth and diversification. Furthermore, focusing growth in Dover is likely to result in development that allows for relatively sustainable patterns of travel.

Transform Dover to become a location of choice to live, work, visit, shop and spend leisure time and be a beacon for the District

There are expected to be wide ranging sustainability benefits associated with the transformation of Dover, as it is recognised that many existing sustainability problems – such as deprivation, lack of skills and an under-performing economy – are ‘entrenched’ and so only likely to be sufficiently addressed by an approach that encompasses major regeneration. The regeneration of areas that are currently deprived or under-performing in an economic sense will have the effect of attracting new investment and promoting business activity in the district.

The transformation of Dover could aim to incorporate sustainable forms of development, in particular sustainable design and construction, as an overarching theme. However, this strategic objective does not emphasise this important point.

Deliver sufficient additional housing to broaden the range and improve the quality and market perception of the District's, and especially Dover's, housing offer and meet the changing needs of the population

This objective refers to improving the market perception of the housing offer in Dover. This is an important objective as there is a clear need to increase the quality and broaden the range of market housing from the baseline situation – a high proportion of low quality market housing. Broadening the range of market housing will attract professionals and skilled people to the District, which is important in order to support economic growth and diversification. Furthermore, delivering additional market housing will also allow affordable housing to be delivered as a result of planning obligations on developers. However, the emphasis of this objective does appear to be biased towards delivering quality market housing, rather than meeting the needs of people who cannot currently access decent and affordable housing.

Address more localised needs for employment, housing and community facilities at Deal, Sandwich and the rural area

This objective recognises that, although Dover will be a priority for widespread regeneration, there are also more localised needs in specific other towns and in the rural area of the district as a whole, which need addressing.

As well as scoring well against social sustainability objectives, this plan objective scores well against economic objectives as there will be the potential to ensure that more local economies are able to remain viable. A knock on effect of promoting local economies and accessibility to local services and facilities will be a reduced need to travel.

However, it is important to recognise that the rural part of the district will include landscapes that are very sensitive to new development.

Ensure that the local economy performs to or exceeds the County and regional averages

This objective seeks economic growth, although it does not give any detail regarding what approach to growing the economy might be favoured. There is no mention of ensuring that this economic growth will be sustainable in the long term. However, elsewhere in the Core Strategy it is made clear that there will be an emphasis on broadening the employment base, particularly moving away from an over reliance on port related activity and the pharmaceuticals sector and increasing the proportion of technical and managerial jobs.

It can be expected that there will be some trickle-down effects that will ensure that everyone in the district benefits to some degree, but it cannot be assumed that this economic growth will be entirely sympathetic to meeting the needs of existing residents and employees in Dover District. However, again there will be other Core Strategy Policies that will go some way to ensuring sustainable outcomes in this respect.

Air pollution is highlighted as one potential significant issue as any attempt to maximise the economic potential in the short-term, without due consideration of long-term sustainability implications, could seek to increase the freight transported by road through the district.

Have no areas falling within the 20% of those most deprived in England

This objective will have significant sustainability benefits as it seeks to address some of the most significant existing sustainability problems, in particular problems related to the pockets of deprivation in the district. This objective will involve targeted regeneration, which is likely to be approached in an integrated fashion, creating communities with improved housing, better access to services, facilities and employment and thriving local economies.

Improve residents' skills levels closer to the County averages

This objective is relatively specific but none the less of strategic importance to the growth of the district's economy. It is assumed that skills levels will be improved across the demographic make-up of the district, and will not just relate to improving skills levels amongst those young people who will be able to contribute most to the district's economy.

Improve ease of travel to, from and within the District for both people and freight; concentrate development where it can best align with facilities and reduce the need for travel, especially at the Regional Hub of Dover; encourage walking, cycling and public transport through the provision of new facilities

Improved ease of travel will be important for the growth of the district's economy and will also have social benefits as a result of improving accessibility. As well as reference to ease of transport, there is also reference to other modes of transport, which will be important for those people who do not have easy access to a private car.

The objective also promotes some key elements of sustainable travel, and so could lead to a decrease in car dependency amongst the district's residents.

The objective refers specifically to improving ease of travel for freight. Given Dover's position as a conduit for freight transport there is little scope for reducing the amount of freight passing through the District. Therefore easing the movement through the District is likely to be a broadly sustainable objective. It will be important that efforts are made to mitigate the environmental and social effects of significant freight passing through the district, and alternatives to freight transport by road are considered.

Maintain and enhance the District's biodiversity, natural environment inheritance, open spaces and outdoor sport and recreational areas to create a coherent network of green infrastructure that can better support wildlife and human health

This objective seeks to promote the district's distinctive natural environment. It promotes an ambitious, integrated approach, where the multifunctional value of open space and greenspace is recognised.

This is a much improved objective from that which was set out at the preferred options stage. However, at the preferred options stage the objective made reference to promoting cultural connections with the natural environment (which is an important element of effective conservation and can have knock on benefits in terms of health and well-being). It is thought that there could be benefits to reinstating such a reference.

Table 13: Summary of key findings

Key Sustainability Implications Highlighted by the Objectives Assessment

- All objectives are likely to either promote economic growth or will support economic growth
- Air pollution is an important sustainability consideration that might be a constraint to growth
- Protection and enhancement of biodiversity is promoted in an integrated fashion
- Freight transport, which can be associated with significant environmental and social effects, but the objective of promoting more sustainable transport patterns amongst residents is also made clear.
- The word sustainable is not included in any of the objectives, and so there will be a reliance on Core policies and Development Management Policies to ensure that growth and development in the District has sustainability at its core.

- All changes made to the objectives since the preferred options stage are considered to be positive.

5.3 Appraisal of the Growth Options

5.3.1 **Table 14** sets out the growth options assessment that was initially included within the Preferred Options SA Report. The assessment suggested that Options 1 and 2 would have the least environmental impacts but also the least economic and social benefits. Options 3 and 4 would both have greater economic and social benefits and higher environmental impacts. Following the appraisal matrix is a discussion of the options.

Table 14: Sustainability Appraisal of the options

Sustainability appraisal objectives	Option 1 – 'Low growth', 6,100 units	Option 2 – 'Medium low growth', 8100 units	Option 3 – 'Medium-high growth', 10,000 units	Option 4 – 'High growth', 14,000 units
1. To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home	+	+	+/+	+
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	0	0	0
3. To improve the health and well-being of the population and reduce inequalities in health	0	+	+	+
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	+	+	+
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	0	0	+	+
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to	0?	0?	-/-?	-/-?

Sustainability appraisal objectives	Option 1 – 'Low growth', 6,100 units	Option 2 – 'Medium low growth', 8100 units	Option 3 – 'Medium-high growth', 10,000 units	Option 4 – 'High growth', 14,000 units
improve				
7. To conserve and enhance biodiversity	0	-?	-?	-
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	-?	-?	-?
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	-?	-?	-?/-	-?/-
10. To create a high quality built environment	-?	0	+?	+?
11. To promote sustainable forms of development and sustainable use of natural resources	-?	-?	-?	-
12. To encourage high and stable levels of employment and sustain economic competitiveness	0/-?	0/-?	+?/0	+?/+
13. To improve the development and retention of skills	-	-	-?	+?
14. To ensure that development benefits everyone in the District	0	0	+?	+

5.3.2 The appraisal found that Options 1 and 2 would be unlikely to trigger the level of activity necessary to invigorate and regenerate the District and in particular Dover. In particular Option 1 risked a continued slow decline in service provision and employment levels and an increasingly aged population (with consequent implications for the local economy and healthcare).

5.3.3 Option 3 represented a compromise between the *certainty* that current trends are not sustainable - in the sense that something has to change within the District if investment and regeneration is to take place on a significant scale - and the *uncertainty* surrounding large-scale growth, and the

risks that this entails. However, it was recognised that Option 3 would leave the potential for some **imbalances post 2016** as the ageing population could lead to a shortage of labour supply.

- 5.3.4 Option 4 was found to have the most uncertainties associated with it. On the one hand, rapid growth in housing and employment could trigger a renaissance in the District: new households could prompt and support a sea change in terms of inward investment, business start-ups etc. These changes could, in turn, encourage further inward migration and regeneration. A significant increase in population and prosperity could encourage transport providers to improve access to the area. However, rapid growth comes with the risk that the provision of such a large amount of housing might not be accompanied by a corresponding number of jobs and services between 2016 and 2026. This could result in Dover and the wider District becoming something of a suburb for commuting to more thriving 'central' areas (e.g. Canterbury), with associated impacts on traffic, air pollution and greenhouse gas emissions. Higher growth would lead to greater resource use, more pollution, and more impacts on the landscape and biodiversity. There was also seen to be a risk that the area might become increasingly divided between the population living and working in the District and those living there but commuting elsewhere.
- 5.3.5 Given the significance of existing economic and social problems in Dover, Option 4 was found to be broadly the best option in terms of economic and some social factors (notably employment and the provision of affordable housing). It was suggested, however, that Option 3 was likely to be more deliverable during the plan period, and cause less environmental harm.

Option 3 or Option 4?

- 5.3.6 The choice between **Option 3** and **Option 4** was not simply about choosing a level of growth for the District. It was recognised that Option 4 would involve construction on more greenfield land around Whitfield. This, in turn, would require a link between the A2 and A256 north of Whitfield, with the potential for impacts on the Lydden and Temple Ewell Downs SAC (a wildlife site protected under European legislation) which is sensitive to air pollution and recreational pressure, both of which could increase as a result of development.
- 5.3.7 The assessment found significant uncertainties associated with Option 4, particularly after 2016. The success of Option 4 relies heavily on jobs growth, and if this does not occur in practice there is a risk that building 14,000 homes could lead to an over-provision of homes, and possibly out-commuting. On the other hand, the appraisal of all the options assumed that economic growth will be 'smart': that it will be based on a workforce that is more efficient than at present. If this increased efficiency does not occur, then it was felt that a larger workforce would be needed to achieve the predicted level of economic growth.
- 5.3.8 Taking all these factors into account, Option 3 was found to be the best option in the short term. However, the SA suggested that it should be viewed as a floor rather than a ceiling. Option 4 may be best in the longer term. It was thought that close monitoring of progress on job creation, delivery of 'smart' growth and house building will be needed regardless of the choice of option. The SA suggested that one possibility might be to aim for Option 4 but look beyond the lifetime of the plan, rather than trying to implement Option 4 by 2026.
- 5.3.9 A key message from the SA was that, whatever option was chosen, the Core Strategy would need to include policies to help ensure that the option is rolled out in a sustainable manner. The higher the level of growth proposed, the stricter these measures would need to be.

5.4 Submission Core and DM Policies Appraisal

5.4.1 This section summarises the appraisal of the Core Policies.

Core Policy 1 – Settlement Hierarchy

Findings of Preferred Options SA

Summary

There were found to be wide ranging sustainability benefits associated with focusing growth in the District's urban areas. Primarily these benefits resulted from the fact that it is existing urban areas that have most to gain from large scale change that will address existing issues and spatial inequalities in terms of deprivation, housing, employment opportunity and access to services and facilities. Furthermore, there are benefits as a result of directing development away from the most environmentally sensitive areas. Growth at urban areas is also seen as sustainable as it will allow high density development and development on brownfield sites, as well as reducing the need to travel and dependency on the private car.

Recommendations

- The first two tiers of the hierarchy talk about the 'scale' of development that is deemed suitable. This is a clear approach. However, the lower tiers of the hierarchy discuss the scale of development that will be required to maintain or attain the required service provider role. It is not clear that this choice of wording gives adequate consideration to the amount of housing that might be suitable in rural towns and villages (i.e. there could be a mention of how local housing need will be met).

How has the Policy changed?

- This was Policy CP2 of the Preferred Options Core Strategy
- Only two minor changes have been made to the settlement hierarchy - Caple-le-ferne is now a local centre, rather than a village; and St. Margaret's is now a village rather than a local centre.

Have the recommendations been taken on-board?

- No

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications and therefore this Policy has not been reappraised against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding recommendations?

- No

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 2 - Provision for Jobs and Homes between 2006 – 2026

Findings of Preferred Options SA

Summary

This Policy sets out the key figures that underpin the planned growth in Dover District. High levels of both housing and commercial growth are promoted. There is the potential for significant sustainability benefits to result from change on this scale in Dover District, with the likelihood being that growth will be of a scale to trigger regeneration, further inward investment, an increase in the number of economically active people and improved retention of skilled workers. Furthermore, seeking to match housing and commercial growth should ensure that more people are able to live and work within reason, as well as meet a greater range of their wider needs locally, therefore reducing the need to travel. None the less, air pollution is likely to be a significant constraint to achieving growth on this scale in a sustainable fashion. There is also the risk of sustainability problems developing should housing and employment growth not occur simultaneously in the way that is currently envisioned. A delivery plan is proposed to monitor this situation.

Recommendations

- There is a risk of employment and commercial development not keeping in step with housing delivery, which could result in decreased access to employment and an increased need for commuting. It will be important to ensure that the delivery plan does not only consider whether overall levels of housing and commercial development are in step with one another, but that spatially there is also a balance between the two.
- It will be important to ensure that transport improvements go hand in hand with local economic growth and job creation, particularly post 2016, to ensure that Dover does not become a centre of out-commuting. However, it is important to realise that a significant increase in the number of people choosing to live in Dover and commute to London by train will not be unsustainable and will be beneficial for the District.
- This Policy promotes a large amount of growth. It will be important that the location of development does not increase flood risk.
- Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality. It will be important that development does not aggravate poor air quality and that improvements in air quality are able to continue.
- Achievement of 'smart' growth is key to the economy. Achieving this will need the coordinated work of multiple partners. If 'smart' growth is not achieved, higher housing numbers and faster build rates may be needed, as well as stronger measures to achieve such growth.
- High levels of growth will require strong measures to minimise water use.

How has the Policy changed?

- This was Policy CP1 of the Preferred Options Core Strategy
- The key difference is that this Policy now allocates 14,000, rather than 10,000 new homes to the District
- Also, the predicted amount of new employment floorspace that will be delivered has been scaled down slightly, from 250,000m² to 200,000 m².
- This Policy has been reappraised against the SA framework – see **Appendix 2**.

Have the recommendations been taken on-board?

- A Delivery Framework is now included as part of the Submission Core Strategy, which mentions the importance of development being spatially (as well as temporally) balanced. The Delivery Framework included as part of the Submission Core Strategy sets out the need to: create jobs in the District; regenerate Dover Town Centre; and ensure infrastructure is in place before or in tandem with housing. The Core Strategy Submission document sets out an extensive range of planned major infrastructure improvements for Dover District. The funding streams afforded by Growth Point status should allow for closer links between planning and infrastructure delivery and the strategy will lead to a large amount of funds becoming available through developer contributions, the allocation of which will be determined by a forthcoming Supplementary Planning Document (SPD).
- A number of other policies in the Submission Core Strategy seek to ensure that development comes forward with appropriate consideration given to creating sustainable travel patterns, including the Strategic Allocation Core Policies and Policy DM11 (Managing travel demand).

What are the sustainability implications of the changes made?

It is possible to have some discussion of the implications of allocating 14,000 as opposed to 10,000 homes, although it is more valuable to have this discussion in spatial terms, rather than just talking about numbers at the District scale.

The Submission Core Strategy states that, while land for up to 14,000 homes will be allocated, the target is to complete a minimum of 10,100 by the end of 2026, consistent with the emerging Regional Spatial Strategy (RSS). This clear long-term perspective should give developers the certainty that they require when considering whether to invest in the District. Furthermore, this provides flexibility, i.e. a local planning framework in place should house builders be in a position to deliver housing faster, or the RSS requirements be reviewed. Phasing delivery over the long-term, rather than intensive development in the short-term, should also allow an emphasis in early years on infrastructure delivery, identification of affordable housing need and development of skills. Looking beyond the plan period (beyond 2026) should also mean building some of the proposed developments later, thus making them subject to stricter building regulations. Delaying development – particularly on land at Whitfield – could also reduce the air pollution impacts of development, as vehicle technology is set to improve significantly.

In general, that there are benefits to growth in the District, but that benefits are less certain, or less certain to be significantly beneficial, without prior knowledge of where growth will be directed to. Similarly, there are likely to be environmental impacts associated with any increase in development, but these are less certain without prior knowledge of where development will occur.

However, higher levels of development will inevitably result in negative effects in terms of some sustainability objectives. Higher growth will lead to greater resource use (notably water consumption, waste production and greenfield land-take), more pollution, and more impacts on landscape and

biodiversity. Greenhouse gas emissions (GHG) associated with buildings will increase overall until level 6 of the Code for Sustainable Homes (and BREEAM equivalent) is reached at which time they may plateau.

However, the Council have developed strong mitigatory measures. In particular, a Green Infrastructure Policy has been developed. It is hoped that this can ensure that the strategic level conservation constraints, opportunities and priorities identified in the draft RSS can be taken forward at the District level. There is also a DM Policy relating to sustainable design and construction, which has been informed by a study examining potential in the District. Furthermore, the Policies relating to the strategic allocations now contain stronger mitigatory measure than was the case at the preferred options stage.

More generally, the Council deserve credit for creating 'key diagrams' showing opportunities and constraints for each of the three settlements that will receive the majority of growth. This is a very transparent approach to planning, which should be helpful to consultees.

The large amount of development promoted through this Policy will lead to socio-economic benefits for the District as a whole, but will increase the potential for some existing residents to lose out as a result of nearby development causing disruption. Careful planning will be required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities.

Are there any outstanding comments / recommendations?

- It will be important to take account of climate change and sea level rise. As well as predicting the effects of rising sea levels, it will also be important to consider how climate change could lead to the need for land intensive responses, such as managed retreat and the creation of wetland habitat along the coast and river valleys. These responses could be driven by national or regional policy in the future, and should be considered through spatial planning now. It will be important that such future contingencies are considered for the low lying land to the north of Deal.
- There is more reference made to flood risk in the Submission Core Strategy, than was the case at the preferred options stage, but this remains an important consideration. Development in the floodplain is clearly an important issue, and there should also be efforts made to ensure that there are not cumulative effects of development, through altering drainage and infiltration patterns, which result in increased 'off-site' flood-risk.
- Although there is a Policy dedicated to maintaining the integrity of the Green Infrastructure Network, it is possible that this could also be supplemented by a DM Policy relating to biodiversity, perhaps suggesting ways in which biodiversity should be designed into development.
- The Green Infrastructure Network should be developed and implemented in consultation with key stakeholders. The local Wildlife Trust would seem to be an ideal candidate, as they can seek to put into practice 'living landscape' principles, through proactive engagement with spatial planning. Natural England may also want to be involved, particularly as they can ensure that landscape character and the protection of the Natura 2000 network are integrated into the green infrastructure strategy. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.
- The Core Policies no longer makes reference to 'smart' growth, although smart growth is referred to as a monitoring indicator. The Council should comment on the continued relevance of Smart Growth and state how the objectives of 'smart growth' will be achieved through the Core Strategy.
- There is no over-arching Policy relating to water efficiency in the Submission Core Strategy, although it is recognised that the findings of the evidence base studies relating to water have been integrated into the Sustainable Construction Policy and a requirement for water strategies to be drawn up for two of the four

strategic allocations.

- It will be important that the Delivery Plan (which will enact the Delivery Framework) is regularly updated and made available to key stakeholders.
- Careful planning is required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 3 – Distribution of housing allocations

Findings of Preferred Options SA

Summary

There were found to be wide ranging sustainability benefits associated with directing the majority of housing growth to the established urban areas of Dover and Deal. Housing in these areas will be most likely to meet local housing need and will mean that new residents can make use of existing services and facilities. There were also seen to be socio-economic benefits associated with the likelihood of housing, along with commercial development, acting as a stimulus for regeneration. Furthermore, housing growth in urban areas is conducive to reducing the need to travel.

The Policy included flexibility to ensure that housing need could be met in the rural areas of the District. This leads to some important sustainability considerations. On the one hand, meeting housing need in rural areas is important to stimulate rural communities and address relative deprivation and economic decline. However, if not well targeted and well integrated, housing in rural areas may result in dormitory communities with high levels of out commuting (possibly out of the District) and high car dependency. Allocating 2,200 houses to rural areas was seen to be not an insignificant amount, and was the reason why the sustainability effects against many of the objectives were scored as uncertain.

Focusing development in Dover and Deal would mean avoiding impacting upon the most important areas of biodiversity and landscape value. However, further consideration would still need to be given to the avoidance of impacts, especially given the large number of houses allocated to rural areas.

Recommendations

- It will be important that the full range of biodiversity and landscape constraints and opportunities associated with the Dover area, the Deal area, the Sandwich area and the rural area are identified at an early stage. This should guide the location and implementation of development, rather than a focus purely on the potential to impact upon the Natura 2000 network.
- It will be important that a precautionary approach is taken to the location of development, which takes account of the uncertainties surrounding flood risk.
- It will be important to ensure that existing residents of Dover and Deal do not suffer as a result of the major construction activity and more general change that will occur over the plan period.

How has the Policy changed?

- This Policy now allocates a further 4,000 homes to Dover.
- The number of homes allocated to the other areas of the District remains unchanged (although Aylesham is now separated out from the rest of the Rural Area).
- This Policy has been reappraised against the SA framework – see **Appendix 2**.

Have the recommendations been taken on-board?

- A Green Infrastructure Network has been developed and policy put in place to ensure the integrity of the existing network of green infrastructure is protected.
- In terms of flood-risk, see CP2. Also, the Submission Core Strategy now highlights the possibility that North Deal could be the recipient of higher levels of development, pending further investigation.

What are the sustainability implications of the changes made?

The increase in housing development and focus of the housing on Whitfield is likely to increase the attractiveness of the Districts housing offer in an area close to where jobs will be created, and so should help to attract and retain economically active and skilled people in the District. However, there are housing needs in other areas of the District other than Dover, which perhaps will remain unmet as a result of this allocation to Whitfield.

The increased housing allocated to Dover will make it likely that economic forecasts can be realised through increased inward investment, business start-ups etc. It is likely that revenue raised through development at Whitfield can contribute to bringing about regeneration in the rest of Dover, as well as reversing the trend of decline in service provision therefore addressing the deprivation inequalities that exist in the District. Regeneration in Dover should lead to improvements in the towns built environment and public realm (which will contribute to more sustainable transport patterns).

Allowing more people to live and work in Dover, as well as meet a greater range of their needs locally, is likely to be the most sustainable option in terms of reducing the need to travel. The phasing of housing and employment development, as well as the timely delivery of infrastructure will also have important implications in terms of promoting more sustainable transport patterns.

Air pollution does, however, remain a constraint to development at Dover. Further development certainly has the potential to worsen the current situation, although there is plenty of scope to mitigate effects. Air pollution can be particularly bad when the port is not functioning properly and traffic tails back through the town. This is an exceptional occurrence rather than the norm, but is an important strategic consideration none the less.

The additional housing development promoted by this Policy will come forward on greenfield land at Whitfield. Delivering a large amount of growth at Whitfield, as promoted by the Growth Strategy, has a range of strategic sustainability implications (although it is interesting to note that a considerably lower housing target would also have required this approach⁷).

The growth allocated to Deal is currently described in the Submission Core Strategy as being of “lower order geared around meeting local rather than strategic needs.” However, it is stated that this is “subject to the outcome of further investigation of the North Deal area.” The Core Strategy Vision states that “Deal

⁷ At the time of the Preferred Options consultation it was thought that 10,000 homes could be delivered without having to develop to the west of Whitfield. However, this was assuming that windfall sites would be included in this figure. Since this time, the Council has learnt that in fact it would have had to deliver 10,000 homes *in addition* to windfall sites.

may have a larger role to play in contributing to the growth strategy if the constraints of the north Deal area can be overcome and the potentials realised.” It is envisioned that any further development at North Deal, if identified by further studies as being appropriate, would be taken forward through an Area Action Plan (AAP).

The North Deal area is associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour. This part of Deal is poorly served in terms of youth, health and community facilities and as it was associated with the former colliery it has been included into the National Coalfields Programme to aid rejuvenation. However, the northern part of Deal, and the countryside between Deal and Sandwich, is subject to the risk of tidal flooding which is a constraint on development. Also, much of the countryside is environmentally sensitive, with areas of that are internationally important in terms of biodiversity.

Are there any outstanding comments / recommendations?

- New housing, particularly in Dover, must act as a catalyst for wider regeneration in the town and not simply gentrification. This can be partly facilitated through careful use of Section 106 monies. Such monies should be channelled from greenfield development into housing renewal in the older parts of Dover.
- Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality
- It will be important that a full range of indirect effects on the biodiversity resource are considered. This should include a consideration of how habitats come together functionally within a landscape. So, for example, internationally or nationally important habitat may be functionally connected to other non-designated or perhaps locally designated habitat in the wider landscape.
- It will be important to maintain the integrity of landscape character, and ensure that it is not eroded. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.

It will be important to ensure that existing residents do not suffer as a result of the major construction activity and more general change that will occur over the plan period. Careful phasing will be important to reduce in-combination impacts.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 4 - Housing Quality, Mix, Density and Design

Findings of Preferred Options SA

Summary

This Policy sought to take account of the specific demographic situation in the District, and promote an appropriate housing mix accordingly. There are a range of social benefits associated with the promotion of affordable housing and also housing that is designed in a way that will benefit the health and well-being of elderly people. Promotion of a mix of housing is also important to ensure that people are available to meet a diverse range of employer needs in the district, including lower paid and lower skilled positions and key worker roles.

Recommendations
• N/A
How has the Policy changed?
<ul style="list-style-type: none"> • This is a very different policy. • This Policy was previously Policy CP5 – Housing quality and mix • It was focused on achieving a mix of housing appropriate to the needs of the District, and also raising the quality of the District's housing offer through ensuring money is filtered into housing renewal schemes. • The Submission Policy is much more focused on ensuring housing quality and housing at an appropriate density. • It does not discuss housing mix, or housing renewal schemes. • This Policy has been reappraised against the SA framework – see Appendix 2.
Have the recommendations been taken on-board?
• N/A
What are the sustainability implications of the changes made?
As a result of no longer discussing housing mix, or housing renewal schemes, this Policy (as compared to the equivalent at the preferred options stage) does not perform as well in a number of socio-economic objectives. However, the Submission Policy is much more focused on ensuring housing quality and housing at an appropriate density.
Are there any outstanding comments / recommendations?
<ul style="list-style-type: none"> • It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities.
Dover District Council's comments
Forthcoming (see Para. 5.1.4)

Table 18: CP5 – Sustainable Construction Standards

Findings of Preferred Options SA
<p>Summary</p> <p>This Policy promoted sustainable design and construction techniques in new developments, which could result in wide ranging sustainability benefits, particularly the efficient use of energy and natural resources.</p>
<p>Recommendations</p> <ul style="list-style-type: none"> • It will be important that the council continually reviews and takes a strategic view on what requirements,

beyond the building regulations, they make on developers.

How has the Policy changed?

- The corresponding policy at the preferred options stage was DM3.
- The Preferred Options Policy simply required standards 'significantly beyond' those set by building regulations.
- The Submission Policy sets specific standards that all new residential should meet and a specific standard for non-residential development above a certain size threshold.
- The Policy also now includes a requirement for residential extensions
- There is a requirement that all new buildings (residential and non-residential) of any size will have to contribute to achieving improvements elsewhere in the District if they cannot achieve them onsite.
- This Policy has been reappraised against the SA framework – see **Appendix 2**.

Have the recommendations been taken on-board?

- Yes

What are the sustainability implications of the changes made?

- Government Policy requires all new housing to meet the carbon saving element of the Code for Sustainable Homes (CfSH) Level 3 by 2010, Level 4 by 2013 and Level 6 by 2016. This Policy therefore does not go beyond what will be required anyway through building regulations in terms of carbon saving. However, the Policy does go further by requiring all new housing in the district to actually *achieve* the CfSH ratings, rather than just meet the minimum standard for the carbon reduction element. This should mean that housing in the District will be required to perform better than is required by building regulations in terms of the other categories of the Code (see Table).

Code for Sustainable Homes categories and issues⁸

Categories	Issue
Energy and CO ₂ emissions	Dwelling emission rate (M) Building fabric Internal lighting Drying space Energy labelled white goods External lighting Low or zero carbon (LZC) technologies Cycle storage Home office
Water	Indoor water use (M) External water use
Materials	Environmental impact of materials (M) Responsible sourcing of materials – basic building elements Responsible sourcing of materials – finishing elements
Surface Water Run-off	Management of Surface Water Runoff from developments (M) Flood risk
Waste	Storage of non-recyclable waste and recyclable household waste (M) Construction waste management (M) Composting
Pollution	Global warming potential (GWP) of insulants NO _x emissions
Health and Well-being	Daylighting Sound insulation Private space Lifetime homes (M)
Management	Home user guide Considerate constructors scheme Construction site impacts Security
Ecology	Ecological value of site Ecological enhancement Protection of ecological features Change in ecological value of site Building footprint

⁸ For more information on the CfSH see www.communities.gov.uk/thecode [online] accessed 01/08

- This can be seen to be relatively ambitious (although is not ambitious in terms of carbon saving). In particular, this Policy will result in minimum requirements in terms of water use that go beyond what will be required by Building Regulations - see Table.

Code for Sustainable Homes mandatory water consumption standards

Code Level	Maximum indoor water consumption in litres per person per day
Level 1 (★)	120
Level 2 (★★)	120
Level 3 (★★★)	105
Level 4 (★★★★)	105
Level 5 (★★★★★)	80
Level 6 (★★★★★★)	80

- What is less ambitious is the requirement for housing to meet CfSH Level 5 by 2016. By 2016 housing will be required to be Level 6 in terms of carbon saving (zero carbon), and so houses will be required to attain the maximum possible carbon saving score (29 points). CfSH Level 6 requires homes to achieve 90 points in total, where as CfSH Level 5 requires homes to achieve 84 points. It can therefore be seen that the Policy is requiring homes to achieve 55 points (84 minus 29) from other categories, when a more ambitious approach would be to require homes to achieve 61 points (90 minus 29) from other categories.
- It is noted that homes that do not meet these standards will be required to achieve commensurate energy and water savings elsewhere in the District. This requirement will require considerable 'fleshing out', presumably in a Supplementary Planning Document, not least because the CfSH is about achieving more than just energy and water savings (although it is accepted that these may be priorities in the District).
- The Council's requirement for non-residential buildings is relatively ambitious, and it is helpful that the Policy makes reference to 'any future national equivalent', as the BREEAM standard is likely to be phased out and replaced by a Code for Sustainable Buildings.

Are there any outstanding comments / recommendations?

- The Council should consider requiring homes to meet CfSH Level 6 by 2016.
- The Council should comment on the potential for developers to push through planning applications before the adoption of the Core Strategy, in an attempt to avoid having to meet sustainable construction standards. Is there a need for planning applications to be required to produce interim Code for Sustainable Homes certificates or design stage BREEAM certificates as appropriate?
- The Council should consider whether it would be beneficial to include a presumption that requirements are met on-site, rather than in a commensurate fashion, wherever possible.
- The statement regarding commuted payments from those buildings that do not meet standards on-site is somewhat ambiguous. It will be important that this does not provide a loophole for developers to lessen their spend on sustainable construction. The Council should comment on this.
- The Council should set out their justification for choosing a threshold of 1000m² for non-residential

buildings.

- The Council should comment on the potential for this Policy to act as a means to reject planning permission, even in circumstances where the proposal meets building regulations.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 6 - Infrastructure

Findings of Preferred Options SA

Summary

There were found to be a wide range of sustainability benefits associated with considering the provision of community infrastructure alongside the provision of physical infrastructure – as was promoted by this Policy. However, it was noted that:

“It is important to realise that the two types of infrastructure differ significantly in the way that they can and should be delivered. Meeting community needs through the provision of community infrastructure should be approached in an integrated and holistic manner, and is not as simple as the provision of a single facility to meet a specific need of a specific community. Provision of community infrastructure through S106 agreements will go some way to ensuring that new and existing residents have an adequate range of accessible services and facilities. However, community infrastructure can be a somewhat ambiguous topic, and so it is important to define clearly what it encompasses.”

It was noted that the supporting text did not list green infrastructure or the provision of flood alleviation measures as important forms of infrastructure. Also, the supporting text promoted the provision of ‘transport networks’ as an important form of physical infrastructure, but did not describe how public transport networks or routes to facilitate walking and cycling would be provided as a form of infrastructure.

Recommendations

- It will be important that community infrastructure becomes more equally distributed amongst the communities of the District. This may mean that new infrastructure is targeted in a way that seeks to redress existing inequalities as well as being delivered alongside new development.
- It will be important that the Development Contributions Supplementary Planning Document promotes an integrated, rather than a piecemeal approach to provision of community infrastructure. An integrated approach would consider the multifunctional value of community infrastructure, for example, recognising that open space can be important for mental and physical health, community cohesion and biodiversity.
- It will be important that measures to alleviate flood risk are considered as an essential infrastructure requirement that must be in place and functional prior to development. This might include hard flood defences. However, it might also mean undertaking a softer approach such as implementing a sustainable drainage system. This type of infrastructure may blur the distinction between a physical and community service, and so it is important that this is not overlooked.
- It will be important to give strategic direction to how the transport and travel needs of communities will be met. Provision of integrated transport networks is not straight forward and it may be necessary to address this separately from the provision of other infrastructure requirements. Furthermore, it will be important again to consider the multifunctional role of such things as a well designed public realm in

encouraging walking as a form of travel, but also having other wide-ranging community benefits.

- It is recommended that 'green infrastructure' is listed in addition to or in the place of 'open space' (it may be useful to refer to it as multi-functional green infrastructure).

How has the Policy changed?

- This was Policy CP6 at the preferred options stage
- The only change to the Policy itself is that it now promotes 2 criteria that must be met before infrastructure is delivered. These criteria seek to ascertain that infrastructure is indeed necessary, and cannot be avoided.
- This Policy now forms part of a clear section of the Submission Core Strategy relating to infrastructure. This includes a long list of key infrastructure that must be delivered, along with dates when it should come forward.
- This Policy has been reappraised against the SA framework – see **Appendix 2**.

Have the recommendations been taken on-board?

- The infrastructure projects are listed under a range of key headings, demonstrating that community and green infrastructure is being considered alongside (and of equal importance to) traditional infrastructure delivery.
- The list of infrastructure projects promotes a package of sustainable transport measures for Dover District (identified in Dover District Transport Strategy)
- Hard flood defences between Sandwich and Pegwell Bay are listed as key infrastructure.
- Other recommendations have not necessarily been taken on-board here, but could be through other policy, the delivery plan or the forthcoming Developer Contributions SPD.

What are the sustainability implications of the changes made?

Although the Policy itself has not changed substantially since the preferred Options stage, the Submission Core Strategy now lists a wide range of essential infrastructure projects that must come forward. These infrastructure projects are listed under a range of key headings, demonstrating that community and green infrastructure is being considered alongside (and of equal importance to) traditional infrastructure delivery. There is also now a Delivery Framework, which should lead to infrastructure delivery being planned for in an appropriate way. It is felt that this is a very transparent approach towards planning for infrastructure.

Are there any outstanding comments / recommendations?

- It will be important that community infrastructure becomes more equally distributed amongst the communities of the District. This may mean that new infrastructure is targeted in a way that seeks to redress existing inequalities as well as being delivered alongside new development.
- It will be important that the Development Contributions Supplementary Planning Document promotes an integrated, rather than a piecemeal approach to provision of community infrastructure. An integrated approach would consider the multifunctional value of community infrastructure, for example, recognising that open space can be important for mental and physical health, community cohesion and biodiversity.

- It will be important that measures to alleviate flood risk are considered as an essential infrastructure requirement that must be in place and functional prior to development. This might include hard flood defences. However, it might also mean undertaking a softer approach such as implementing a sustainable drainage system. This type of infrastructure may blur the distinction between a physical and community service, and so it is important that this is not overlooked.
- There is a need to be clear about how the Strategic Housing Market Assessment will guide affordable housing delivery.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 7 – Green Infrastructure

Findings of Preferred Options SA

Summary

N/A (new policy)

Recommendations

- N/A (new policy)

How has the Policy changed?

- N/A (new policy)

Have the recommendations been taken on-board?

- N/A (new policy)

What are the sustainability implications of the changes made?

Appendix 2 sets out the appraisal of this Policy against the SA framework. The appraisal findings can be summarised as:

The green infrastructure network should help to ensure that a proactive approach is taken to protecting and enhancing the Districts biodiversity resource. Good management of the green infrastructure network should also result in more wide ranging benefits, including:

- Ensuring that valued natural areas remain accessible, which should encourage outdoor recreation
- Good catchment management and good coastal management, reducing flood risk.
- Ensuring that the District's image is suitable for attracting business
- Raising awareness and appreciation of the distinctive elements of the District's countryside
- Ensuring that existing residents benefit from development in the District.

However, it is noted that this Policy does not necessarily promote the close integration of green

infrastructure closely with development.

Are there any outstanding comments / recommendations?

- The green infrastructure network should be designed and implemented in such a way that there are multifunctional benefits.
- It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 8 – Dover Waterfront

Findings of Preferred Options SA

Summary

The proposed development of the Wellington Docks area was identified as having the potential to capitalise on one of the town's unique assets. The resulting development would have the potential to be sustainable in many respects, being a vibrant area that benefits the community of the town as a whole and also has the potential to attract tourism and outside investment to the town. There is the potential for this development to be well integrated with the regeneration of the town centre and other parts of the town, and there is nothing to suggest that this initiative would detract from regeneration elsewhere. In particular, there is potential for this development to be a key driver of making Dover a town that embraces walking and cycling as a form of transport.

A number of important sustainability constraints were identified. Some of these appeared to be at the forefront of decision making, such as the importance of protecting and integrating heritage, where as others, such as flood risk and the integration of sustainable design and construction did not.

Recommendations

- Given that this is to be a landmark development that seeks to command attention and give people a lasting image of Dover, there is an opportunity to promote Dover as an innovative and sustainable town through the use of sustainable design and construction.
- It is felt that a precautionary approach would be to assume that there will be some degree of flood risk and to begin to consider how this risk will be mitigated at an early stage, pending the findings of the FRA. In particular, it is recommended that design should be promoted that is functional, if not resistant to flooding, rather than design that is only aesthetically pleasing, as is the current emphasis of the Policy and supporting text.
- Air pollution will be a significant consideration as it has the potential to affect the health of those who live and work in the new development. Air pollution should be a consideration when developing the masterplan.

How has the Policy changed?

- This was known as Policy CP8 – Wellington Docks – at the preferred options stage.
- It has now been identified that there should be a minimum of 400 dwellings as part of the development, rather than 300, as was promoted at the preferred options stage.
- There is also more detail given on the floorspace that will be allocated for certain uses.
- There are now stronger mitigatory measures (see below)

Have the recommendations been taken on-board?

- The Policy now requires all development, both residential and non-residential to meet standards of sustainable design and construction.

What are the sustainability implications of the changes made?

- It is felt that, essentially, this is still a mixed use development in the same location, and of a similar scale, to that promoted at the preferred options stage. Therefore, this altered Policy has not been reappraised against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).
- However, the sustainable design and construction standards and requirements improve the performance of the development in terms of SA Objective 6. (relating to reducing greenhouse gas emissions). These are in conformity with the recommendations made by the Dover District Renewable Energy and Sustainable Construction Study. It is helpful that priorities have been identified in terms of what elements of the CfSH should be the focus (in this case sound insulation).

Are there any outstanding comments / recommendations?

- It is felt that a precautionary approach would be to assume that there will be some degree of flood risk and to begin to consider how this risk will be mitigated at an early stage, pending the findings of the FRA. In particular, it is recommended that design should be promoted that is functional, if not resistant to flooding, rather than design that is only aesthetically pleasing, as is the current emphasis of the Policy and supporting text.
- Air pollution will be a significant consideration as it has the potential to affect the health of those who live and work in the new development. Air pollution should be a consideration when developing the masterplan.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 9 – Mid Town, Dover

Findings of Preferred Options SA

Summary

The proposed Mid Town development was seen to have the potential to improve significantly on this part of Dover. In particular, the development would benefit from making the most of the River Dour as a natural resource and also complementing the regeneration of Dover Town Centre. Improving the aesthetic and functional/ecological status of the river corridor would have benefits in terms of biodiversity and also in terms of creating a sense of place. The river would also become an important walking route. In general this development could have the effect of making Dover a more compact town and allowing the town to be more accessible by walking and cycling.

The main drawback of focusing on integrating a significant amount of retail as part of the development was seen to be that a multi-storey car park would be required, resulting in people accessing the area easily by private car, rather than making use of more sustainable modes of transport.

The proposal aimed to complement the expansion of the College, resulting in the setting of the College being improved. This improved educational facility and learning environment would contribute to efforts to improve levels of skills in Dover, which could in turn attract employers to the District.

Flood risk was seen as likely to be a significant constraint to development in the Mid Town, although a Flood Risk Assessment was proposed.

Recommendations

- It will be important that early consideration is given to how residual flood risk can be mitigated through design measures.
- It is important that consideration is given to other options to develop the Mid Town that could allow access to the area by private car to be discouraged.
- It will be important that the full range of interest groups in the town centre are consulted at an early stage before determining the scale and type of development that is most suitable for the Mid Town.

How has the Policy changed?

- This was Policy CP9 at the preferred options stage.
- It has now been identified that there should be a minimum of 100 dwellings as part of the development, rather than 200, as was promoted at the preferred options stage.
- There is also more detail given on the floorspace that will be allocated for certain uses.
- There are now stronger mitigatory measures (see below)

Have the recommendations been taken on-board?

- The Policy now requires all development, both residential and non-residential to meet standards of sustainable design and construction.
- The Policy now includes stronger wording requiring the designing out of flood risk.

What are the sustainability implications of the changes made?

- It is felt that, essentially, this is still a mixed use development in the same location, and of a similar scale, to that promoted at the preferred options stage. Therefore, this altered Policy has not been reappraised against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).
- However, the sustainable design and construction standards and requirements improve the performance of the development in terms of SA Objective 6. (relating to reducing greenhouse gas emissions). It is helpful that priorities have been identified in terms of what elements of the CfSH should be the focus (in this case sound insulation).

Are there any outstanding comments / recommendations?

- Further consideration could be given to means of discouraging access to the area by private car.
- It will be important that the full range of interest groups in the town centre are consulted at an early stage before determining the scale and type of development that is most suitable for the Mid Town.
- Flood risk and drainage issues require further attention in the Mid Town.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 10 – Connaught Barracks, Dover

Findings of Preferred Options SA

Summary

This was appraised as a major residential development that would also include a significant mixed use element. The site is sensitive in terms of its historic and landscape value, but there was seem to be the potential for many effects to be mitigated through careful design. Potentially important trade-offs were identified, particularly in terms of loss of historic integrity but increased accessibility to this heritage. It was also recognised that developing the site could prevent the historic resource from being neglected and falling into disrepair.

The proposed policy and supporting text focused on overcoming certain constraints and maximising a relatively narrow range of opportunities, but it was felt that, being a major residential development a range of other issues would require strategic consideration.

It was felt that the use of this site in this way could result in something of a prestigious development that complements the envisioned regeneration and transition of Dover to towards becoming an area of higher value economic activity. However, it was identified that it would be important that the full spectrum of the population of the District could be shown to benefit as a result of the use of this site.

Recommendations

- It is important that consideration is given to alternative uses of the site that could potentially benefit the population of Dover as a whole. For example, it will be important to consider whether there could be any alternative options for less intensive uses of the area that could capitalise more on its value as a

recreational / heritage resource for a wider range on people.

- Given the large scale nature of the residential development at Connaught Barracks the aim of creating an exemplar sustainable urban extension could be included in the Policy wording. Options for sustainable design and construction and also bespoke approaches for designing low / zero carbon energy generation should be considered.
- Given the large scale nature of the residential development it will be important to consider bespoke approaches to minimise the car dependency of residents.
- It will be important that consideration is given to the protection and enhancement of all the important ecological features on the site, and not just the protected species.
- It will be important that the site includes a mix of housing. It may be that the role of housing at the site should be to increase the proportion of upper end market housing in the District, as is currently promoted by the Policy. However, the potential for low cost market housing to add to the housing mix should be considered.
- The potential to re-use existing buildings should be explored
- It will be important that full consideration is given to the issue of contaminated land before any development of the site begins.
- The type and scale of employment development that is planned for Fort Burgoyne should be clarified.

How has the Policy changed?

- The new Policy is more concise and includes substantially changed wording
- There is clarification that housing should be on the Connaught Barracks part of the site only, and that it should improve Dover's upper mid-market range housing offer.
- There are more developed and refined ideas relating to the conservation of the natural and historic environment.
- There are now stronger mitigatory measures (see below).

Have the recommendations been taken on-board?

- The Policy now requires all development, both residential and non-residential to meet standards of sustainable design and construction.
- The Policy promotes and gives direction to a bespoke transport strategy.
- Local ecological opportunities and constraints are now better addressed.

What are the sustainability implications of the changes made?

- It is felt that, essentially, this is still a mixed use development in the same location, and of a similar scale, to that promoted at the preferred options stage. Therefore, this altered Policy has not been reappraised against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

- However, the sustainable design and construction standards and requirements improve the performance of the development in terms of SA Objective 6. (relating to reducing greenhouse gas emissions). It is helpful that priorities have been identified in terms of what elements of the CfSH should be the focus (in this case sound insulation).
- Furthermore, this Policy is now carefully worded to ensure that the unique and valued elements of the nearby historic and natural environment (including the nearby Dover to Kingsdown Cliffs SAC, more commonly known as 'the White Cliffs of Dover') will be protected. It is likely that the Policy should ensure good access (for residents) to natural and historic assets.
- It is noted that housing will be focused on the upper mid-range of the market. This will be important in terms of diversifying and improving Dover's housing offer, and attracting skilled workers.

Are there any outstanding comments / recommendations?

- It will be important that the site includes a mix of housing. It may be that the role of housing at the site should be to increase the proportion of upper end market housing in the District, as is currently promoted by the Policy. However, the potential for low cost market housing to add to the housing mix should be considered.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

Core Policy 11 – The managed expansion of Whitfield

Findings of Preferred Options SA

Summary

It was identified that this major residential led mixed use development that would go some way to improving housing choice in Dover, and could therefore be seen as being of importance for the economic regeneration of the town. The relatively good access from the site to the town centre and the White Cliffs Business Park also indicated that this site could perform well in terms of economic objectives.

Being an expansion of an existing community it was identified that of primary importance would be ensuring that the existing community benefits as a result. The consideration of the existing community was a major focus of the Core Strategy Policy. For example, it recognised that there is a need to create a new local centre, and that this should benefit Whitfield as a whole. The intention to provide several community facilities was stated. However, the Policy was felt to be lacking any vision of the range of facilities and other types of community infrastructure (such as open and green space) that must be delivered alongside a well designed public realm, if Whitfield is to become a more sustainable community.

Few significant site constraints were identified (although further research required). It was noted in the supporting text to the Policy that surface water runoff might need to be addressed.

Recommendations

- The Policy refers to demonstrating that there are 'environmental benefits'. It is not clear what this statement is referring to.
- Given the large scale nature of the residential development at Whitfield, options for sustainable design and construction and also bespoke approaches for designing in low / zero carbon energy generation

should be considered. This could include community heating systems that could benefit the existing community.

- Given the large-scale nature of this residential development there should be consideration given to innovative and ambitious measures to reduce car dependency amongst the residents of Whitfield.
- The development will be on Greenfield land and so it will be important to consider whether access to the countryside for existing residents is affected.
- The Policy describes the importance of delivering a new school, GP surgery and community centre. It is felt that at this strategic level an integrated approach to delivering community benefits, based around a well connected, diverse and accessible public realm should be promoted. The supporting text also makes reference to delivery of a new 'community hub'. It is felt that this idea should be expanded upon.
- This is a major development and so it will be important to ensure that the amenity of the existing residential population is not adversely affected.

How has the Policy changed?

- The Policy now allocated an increased quantum of development
- The wording relating to phasing has changed
- More detailed given on how access and transport priorities will be met.
- A clear link is made between design and achieving other local objectives (e.g. green infrastructure and sustainable transport)
- Where as the previous Policy simply promoted a housing 'mix', this policy is more specific.
- The wording relating to impacts on existing communities has changed.
- There is now no longer reference to specific elements of community infrastructure.
- There is now only a more general reference to affordable housing.
- There are now stronger environmental mitigatory measures (see below).

Have the recommendations been taken on-board?

- There are now more specific and meaningful descriptions of environmental and community benefits
- The Policy now requires all development, both residential and non-residential to meet standards of sustainable design and construction.
- There is a requirement for a transport strategy, which tackles some strategic issues identified in the policy.
- There is reference to ensuring green infrastructure running through the site connected to the wider countryside.
- It is felt that the Policy does now better promote a "well connected, diverse and accessible public realm", but no longer refers to how specific elements of community infrastructure integrate with this.

What are the sustainability implications of the changes made?

This altered Policy has been reappraised against the SA framework – see **Appendix 2**.

This Policy promotes a development of at least 5750 dwellings, considerable more than the 1,800 dwellings promoted by the corresponding Policy at the preferred options stage. This Policy promotes development to the east and west of Whitfield, whereas the corresponding Policy at the preferred options stage promoted development to the east of Whitfield only. This Policy promotes development to the west of Whitfield, whereas the corresponding Policy at the preferred options stage did not. However, it is now recognised that even a smaller quantum of development (as promoted at the preferred options stage) would have required development to the west as well as to the east of Whitfield.

This Policy should contribute significantly towards improving and widening the housing offer in Dover, which will be important in order to attract skilled workers to the District and increase the probability that economic forecasts can be achieved. Development of this land raises the need for substantial infrastructure (in particular transport, health and education). The development is of a size where major investment in infrastructure can be funded through the development. The Policy should ensure that infrastructure delivery remains in balance with housing and other development. Whitfield is potentially within easy reach of the Town Centre, and there is potential to improve connectivity and ease of access to services, facilities and employment.

Strong mitigatory measures have been developed to address potential impacts of the development. In particular, the Council have given serious thought to mitigating potential effects on important areas of nearby countryside (and the historic environment) through the provision of areas of open space that can easily be accessed from the development. Furthermore, a strong Policy has been developed relating to ensuring high standards of sustainable design and construction.

Increasing the quantum of development at Whitfield has the potential to increase negative impacts on the existing local community. The community will be affected during the construction phase, which could last for a number of years. Furthermore, residents will lose ease of access to the surrounding countryside. However, the Policy does include wording to minimise negative impacts on the existing community and that existing residents benefit in a number of respects.

Are there any outstanding comments / recommendations?

- The Council should expand upon ways in which the development at Whitfield will contribute to meeting the affordable housing need in Dover.
- The Council should comment on what benefits can be expected as a result of the link between the A2 and A256 north of Whitfield, including benefits for existing residents.
- The Council should comment on how 'neighbourhood centres' compare to a 'local centre'
- The Council should consider taking onboard the recommendation of the Dover District and Renewable Energy and Sustainable Construction Study that housing should 'aspire to' CfSH Level 5 with immediate effect. This will be particularly important as little housing will come forward in Whitfield in the near future, and so it may be that CfSH Level 5 is more achievable by the time that housing does come forward.
- Lenacre Wood must be an integral part of a local green infrastructure network, which is aimed at optimising ecological permeability across the area, as well as allowing access by residents of Whitfield.
- It will be important to consider whether this landscape contributes to or 'supports' the overall landscape character of the Kent Downs.
- There must be early commitment to exemplary sustainable design and construction standards and

particularly CO2 reduction and water efficiency targets in Whitfield. It is notable that the development will be of a similar size to a number of the proposed Ecotowns, and so the Ecotowns Planning Policy Statement, and the proposals being put together by the development proponents, could be taken into account when planning the expansion of Whitfield.

- It will be important that the Council takes on board the findings of the Water Cycle Strategy in terms of how to minimise water use in the built environment and ensure that the vulnerable water resources associated with the area are protected from pollution.
- The Council should take the opportunity to expand on measures that will be in place to minimise impacts on the existing community.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM1 – Settlement boundaries

Findings of Preferred Options SA

Summary

It was found that focussing development within settlement boundaries has wide ranging sustainability benefits and in particular should:

- Allow for the possibility for development to be integrated with wider initiatives for regeneration, particularly if the development is mixed use
- Ensure that proposals for development are focused on brownfield sites wherever possible
- Protect the countryside
- Ensure that development is accessible to all
- Reduce car dependency and encourage walking, cycling and use of public transport

It was thought that the Policy could be considered to restrict developer's ability to locate development where they consider it would be most viable. However, taking a strategic view, and considering cumulative effects, indicated that in the long term such development might prove to be unsustainable, and therefore not viable. There was thought to be sufficient other policy in the Core Strategy to ensure that where there are justifiable exceptions, development could occur outside of settlement boundaries.

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM4 at the preferred options stage
- The Policy wording has not changed

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- N/A
- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09)

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM2 – Protection of Employment Land and Buildings

Findings of Preferred Options SA

Summary

The appraisal found that:

"Much Core Strategy Policy is aimed at bringing about change in the District. There is the potential for some groups to lose out, and one such group might be those who are employed in smaller scale or less 'high value' employment. This Policy seeks to give some protection to these employment types. This Policy seeks to protect small employment premises and will therefore be of benefit to small companies. This will help to ensure that the diversity of business and employment opportunities in the District is not eroded. This may go against market forces, but is likely to be beneficial to the long-term health of the District's economy and will benefit those seeking work in the District."

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM5 at the preferred options stage.
- The Policy now also seeks to protect land allocated for employment uses or with extant planning permission for employment uses.
- It includes the caveat that employment land / buildings can be reallocated if this is promoted by a DPD.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There is no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09)
- The sustainability benefits highlighted by the appraisal at the preferred options stage remain.
- The extension to this Policy will have benefits in terms of ensuring that there is land available to maximise economic growth in Dover District, which will be important in terms of achieving the growth strategy, and ensuring that Dover becomes a balanced and thriving District.
- The new caveat is reasonable.

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM3 – Commercial Buildings in the Rural Area

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy allows flexibility to ensure that, where a sustainable opportunity presents itself, employment development can occur in rural areas. This will create opportunities for rural communities that might otherwise be relatively economically deprived.

It emphasises the importance of scale and setting, and so should help to ensure a high quality built environment in rural areas. However, a major drawback is that employment development in rural areas will inherently lead to a high degree of car dependency when accessing employment. This should be mitigated to a degree by Policy DM 15.

This Policy adds clarity to the issue of how the settlement hierarchy should dictate the location of employment development in rural areas. Such information will be important for businesses looking to invest in the District."

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM6 at the preferred options stage.
- The Policy wording now adds that, if development must be outside of settlement boundaries, it should be adjacent to the boundary.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM4 – Re-Use or Conversion of Rural Buildings

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy has significant benefits in terms of allowing efficient use of rural buildings that might otherwise be derelict or underused. Also, there may be a specific demand for businesses that want to locate in such a property, and so this Policy can be seen to facilitate business activity. Both these effects are relatively small in their magnitude.

A less significant effect is the fact that jobs will be created in rural areas, which can aid rural economies. However, it is important to consider that employment uses in rural areas will be more likely to foster car dependency amongst those who work there."

Recommendations

- It will be important to ensure that there are no cumulative effects on any particular rural community or rural landscape as a result of the incremental conversion of rural buildings away from traditional uses. Traditional uses should also be encouraged where they may remain feasible.

How has the Policy changed?

- This was Policy DM7 at the preferred options stage
- The Policy is now more specific in terms of what uses are acceptable in the rural area.
- There is no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09)

Have the recommendations been taken on-board?

- No

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- It will be important to ensure that there are no cumulative effects on any particular rural community or rural landscape as a result of the incremental conversion of rural buildings away from traditional uses. Traditional uses should also be encouraged where they may remain feasible.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM5 – Provision of Affordable Housing

Findings of Preferred Options SA

Summary

The appraisal found that:

"There is a significant need for affordable housing in the District. This Policy seeks to ensure that this need is met. At the same time it seeks to ensure that requirements on developers are not overly stringent, and so allows for a degree of flexibility. This will be important to ensure that developers are not discouraged from building houses in the District.

This Policy recognises that housing developments should include a mix of market and affordable housing in order to foster social inclusion. However, it also recognises that a priority in the District is to address existing pockets of deprivation in Dover, and so makes provision for affordable housing to be disproportionately targeted here."

Recommendations

- House prices in the District could well rise as a result of High Speed 1 services to London and improved

economic performance. Affordable housing policy should therefore be kept under careful review.

How has the Policy changed?

- This was Policy DM8 at the preferred options stage
- The Policy now makes reference to delivering an appropriate mix of housing.
- The Policy now includes more room for manoeuvre and negotiation.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).
- Reference to exact requirements, as well as being guided by the Policy, also taking into account “*economic viability having regard to individual site and market conditions*” will give developers more opportunity to demonstrate that they should contribute less to meeting affordable housing needs. It might be that developers seek to demonstrate that they should not be required to provide social housing in particular, as this requires the greatest amount of subsidy on their part. It could be, therefore, that the changes made to this Policy have the effect of decreasing the likelihood of housing need, and particularly acute housing need, being met in the District.
- It could also be the case that this will lead to less certainty and more prolonged negotiation over developer contributions for affordable housing, which could slow delivery.

Are there any outstanding comments / recommendations?

- House prices in the District could well rise as a result of High Speed 1 services to London and improved economic performance. Affordable housing policy should therefore be kept under careful review.
- The Council should comment on whether the new caveat included as part of the affordable housing policy could potentially decrease the likelihood of housing need, and particularly acute housing need, being met in the District.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM6 – Rural Exception Affordable Housing

Findings of Preferred Options SA

Summary

The appraisal found that:

“This Policy recognises that there is an existing need for affordable housing in some rural areas, and that this need may not be met without the issue being promoted through Policy at the strategic level. However, meeting this need may require some important sustainability trade-offs. This Policy allows for housing developments to come forward outside of rural settlement confines. These will invariably be on greenfield land. Furthermore, this Policy does not include stringent requirements to ensure that rural affordable housing schemes are located in close proximity to villages that can provide a minimum level of services. As a result it is likely that car dependency amongst the residents of such settlements could be high.”

Recommendations

- It will be important that affordable housing schemes in the rural area beyond village confines are still built to a relatively high density so that they represent an efficient use of land.

How has the Policy changed?

- This was Policy DM9 at the preferred options stage
- The reference to meeting standards of sustainable design and construction has been removed

Have the recommendations been taken on-board?

- No

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).
- It is noted that Policy CP5 requires standards of sustainable construction.

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM7 – Provision for Gypsies, Travellers and Travelling Showpeople

Findings of Preferred Options SA

Summary

The appraisal found that:

“This is a high level Policy that aims to establish an overall policy approach to guide the production and implementation of a Gypsies and Traveller Site Allocation Document (should one be required). As such it is not surprising that there is a lack of detail, and that not all sustainability considerations have been addressed. However, it is felt that the statements that are made are could be more strategic and all encompassing in their nature, perhaps even aspirational.

It is important to note that there is a range of other locational criteria of importance to meeting Gypsy and Traveller needs other than accessibility to services, facilities and public transport. In fact there is a broad range of factors that should be considered when seeking to find suitable sites that meet the needs of both the settled and travelling community (win-win situations) as well as wider sustainability considerations.”

Recommendations

- These statements could possibly be less specific and more strategic and aspirational. However, it is recognised that they must serve the purpose of criteria that can be used to guide the location of pitches.
- Consider merging the second and third points and instead include another point that will ensure that sites are broadly beneficial to the Gypsy and Traveller community (perhaps drawing on the points made under the ‘Sustainability’ heading in Government Circular 01/06/2006.
- It will be important that the Gypsy and Traveller site allocations document gives consideration to the full range of effects on the settled and travelling community that can result from the decision of where to locate Gypsy and traveller sites.

How has the Policy changed?

- This was Policy DM9 at the preferred options stage
- The Policy now includes one additional locational criteria, relating to flood risk.

Have the recommendations been taken on-board?

- No

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).
- The more criteria are added the more it looks like this is a definitive list of locational criteria, which can be taken literally and used to locate Gypsy and traveller sites. It is still felt that there are further locational criteria that must apply, and that this Policy could potentially benefit from giving more high level guidance, leaving locational criteria to be determined by any forthcoming site allocation DPD.

Are there any outstanding comments / recommendations?

- These statements could possibly be less specific and more strategic and aspirational. However, it is recognised that they must serve the purpose of criteria that can be used to guide the location of pitches.
- Consider merging the third and fourth points and instead include another point that will ensure that sites are broadly beneficial to the Gypsy and Traveller community (perhaps drawing on the points made under the 'Sustainability' heading in Government Circular 01/06/2006).
- It will be important that the Gypsy and Traveller site allocations document gives consideration to the full range of effects on the settled and travelling community that can result from the decision of where to locate Gypsy and traveller sites.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM8 – Replacement Dwellings in the Countryside

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy does not result in any significant sustainability effects. There are no significant trade-offs between Sustainability Objectives that require consideration and there is no mitigation required"

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM11 at the preferred options stage
- An extra criteria has been added, relating to flood risk.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM9 – Accommodation for Dependent Relatives

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy does not result in any significant sustainability effects. There are no significant trade-offs between Sustainability Objectives that require consideration and there is no mitigation required."

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM12 at the preferred options stage
- An extra criteria has been added, relating to flood risk.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM10 – Self-contained Temporary Accommodation for Dependent Relatives

Findings of Preferred Options SA
<p>Summary</p> <p>The appraisal found that:</p> <p><i>“This Policy does not result in any significant sustainability effects. There are no significant trade-offs between Sustainability Objectives that require consideration and there is no mitigation required.”</i></p>
<p>Recommendations</p> <ul style="list-style-type: none"> • N/A
How has the Policy changed?
<ul style="list-style-type: none"> • This was Policy DM14 at the preferred options stage.
Have the recommendations been taken on-board?
<ul style="list-style-type: none"> • N/A
What are the sustainability implications of the changes made?
<ul style="list-style-type: none"> • N/A • The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09).
Are there any outstanding comments / recommendations?
<ul style="list-style-type: none"> • N/A
Dover District Council's comments
<ul style="list-style-type: none"> • N/A

DM11 – Location of Development and Managing Travel Demand

Findings of Preferred Options SA
<p>Summary</p> <p>The appraisal found that:</p> <p><i>“This Policy is broadly sustainable as it will promote good access and prevent major trip generating development from coming forward in locations where it would lead to a fostering of car dependency. It is important to consider that this Policy can be seen to limit where development can be brought forward, which could have the effect of discouraging investment in the District. However, bearing in mind that this Policy is closely tied to national policy, effects are not likely to be significant (i.e. Dover will not be at a</i></p>

<i>competitive disadvantage).</i> ”
Recommendations <ul style="list-style-type: none"> • N/A
How has the Policy changed? <ul style="list-style-type: none"> • This was Policy DM15 at the preferred options stage. • This Policy has been added to, so that it now requires some planned development to prepare travel plans. The Policy also gives some direction as to what the focus of the travel plans should be. • There is no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09)
Have the recommendations been taken on-board? <ul style="list-style-type: none"> • N/A
What are the sustainability implications of the changes made? <ul style="list-style-type: none"> • There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09). • The additional requirement will have benefits in terms of minimising unsustainable travel patterns. The requirement for some development to plan for travel demand is unlikely to be seen as a burden that could discourage investment in the District.
Are there any outstanding comments / recommendations? <ul style="list-style-type: none"> • N/A
Dover District Council’s comments <ul style="list-style-type: none"> • N/A

DM12 – Road Hierarchy and Development

Findings of Preferred Options SA
Summary This is a new Policy.
Recommendations

• N/A
How has the Policy changed?
• N/A
Have the recommendations been taken on-board?
• N/A
What are the sustainability implications of the changes made?
<ul style="list-style-type: none"> • The appraisal of this Policy against the SA framework can be found in Appendix 2, with the following providing a summary: • Seeking to avoid traffic congestion, as is promoted by this Policy, has a range of sustainability benefits, including benefits relating to health, accessibility, air pollution, and the image of the district. Reducing traffic will also be important in terms of ensuring an efficient bus network. This Policy is not detailed and does not specify how the Policy will seek to maximise any specific benefits.
Are there any outstanding comments / recommendations?
• N/A
Dover District Council's comments
• N/A

DM13 – Parking Provision

Findings of Preferred Options SA
Summary This is a new Policy.
Recommendations • N/A
How has the Policy changed?
• N/A

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- The appraisal of this Policy against the SA framework can be found in Appendix 2, with the following providing a summary:
- This Policy seeks to carefully manage the amount of parking provision that is suitable for residential development. More parking provision is promoted away from city centres, where people are likely to be more reliant on the private car. Managing provision in this way should have a range of sustainability benefits. The Policy also promotes a design-led approach, which should help to ensure that parking does not hinder wider efforts to improve the quality of the built environment in the District.

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM14 – Roadside Services

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy does not result in any significant sustainability effects. There are no significant trade-offs between Sustainability Objectives that require consideration and there is no mitigation required."

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM16 at the preferred options stage.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- N/A

- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM15 – Protection of the Countryside

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy will ensure that development is only permitted in the countryside in situations where it would benefit those that live in the countryside. This is a sustainable approach to protecting the countryside in the long-term, as the health of the countryside is closely tied to the health of the rural economy and rural communities.

The countryside is a resource that all can benefit from, and as such it is unfair to expect rural communities to bear the burden for protecting it. This Policy seeks to ensure that this does not occur. In particular it will ensure that the rural economy is not unduly restricted, and in combination with Policy DM 9, will ensure that rural affordable housing need is not ignored in order to protect the countryside."

Recommendations

- The Policy should make reference to the 'distinctiveness' of the countryside

How has the Policy changed?

- This was Policy DM18 at the preferred options stage.
- An extra criteria has been added, which seeks to ensure that only development allocated through a DPD will be allowed to negatively impact on the countryside (plus it will have to meet the other three criteria).
- The Policy now also states that negative effects must be mitigated.

Have the recommendations been taken on-board?

- Yes. The Policy now refers to countryside *character*.

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).).
- The changes made should give greater potential to prevent negative effects on countryside character, and ensure that effects are mitigated where they do occur. However, it is important to realise that many effects on countryside character will occur in a cumulative fashion.

Are there any outstanding comments / recommendations?

- It will be important that the Site Allocations DPD takes account of countryside character beyond simply considering the location of the AONB and also considers the potential for cumulative effects on countryside character.
- The Council should comment on how countryside character might be judged.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM16 – Landscape Character

Findings of Preferred Options SA

Summary

The appraisal found that:

"Landscape character assessment is an important tool. It can identify a spatial framework within which specific approaches to spatial planning can be targeted (i.e. objectives / opportunities / constraints / priorities can be set). This can result in environmental, social and economic benefits.

Environmental benefits will result from identifying and addressing of natural and semi-natural processes that are associated with specific landscapes.

For rural communities, protection and active maintenance of characteristic landscapes can be particularly important in maintaining a 'sense of place'. This can also benefit rural economies. Also, social benefits more generally can result from maintaining distinctiveness, as this can allow people to develop an understanding of their local countryside, which therefore makes it more intellectually accessible."

Recommendations

- This Policy could take a slightly more positive tone. It might state that *"Development should consider the existing character and characteristic features of the landscape, as identified by the process of landscape character assessment, as well as any other studies at a smaller scale. Care should be taken to ensure that landscape character is not eroded, which will be particularly important for sensitive landscapes. Opportunities for integrated approaches to restore or enhance landscapes that currently lack distinctiveness or legibility should be considered."*

How has the Policy changed?

- This was Policy DM19 at the preferred options stage.
- Rather than simply stating that impacts on the landscape will not be permitted, the Policy now also lists situations in which impacts will be permitted.
- The Policy now states that character will be judged according to the District Landscape Character Assessment.

Have the recommendations been taken on-board?

- The Policy is more proactive in the sense that it gives importance to the findings of landscape character assessment, and so recognises that all landscapes have a value, rather than just protected landscapes.

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).).
- The Policy has been weakened somewhat by the caveat that has now been included in a policy which previously simply sought to ensure the protection of landscape. However, as the Policy seeks to make use of the findings of landscape character assessment it can still be considered to be relatively strong.

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM17 – Groundwater Source Protection

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy represents a comprehensive approach to protecting groundwater, which is an important natural resource and is also important for biodiversity."

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM19 at the preferred options stage.
- The Policy now recognises that Sustainable Drainage Systems (SuDS) can increase infiltration of surface water, and so may not be suitable in Groundwater Protection Zones.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).).
- The changes made should provide further protection to groundwater.

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM18 – River Dour

Findings of Preferred Options SA

Summary

The appraisal found that:

"This is a very positive policy, which seeks to redress the underuse of the River Dour as an environmental resource that has the potential to benefit biodiversity as well as the local community and all of those who live in Dover. The community will benefit as a result of being able to access an area that can be considered an attractive element of the urban public realm but also allows a degree of connection with nature and should foster understanding of the historical character of Dover. The effect should be benefits in terms of health and well-being as well as sense of place. There should be environmental benefits in terms of promotion of walking and cycling as well as biodiversity benefits, assuming that new proposals include action to improve the connectivity of natural habitat along the river corridor."

Recommendations

- There should be a reference to the flood risk associated with the River Dour and whether there is any potential for land uses that might mitigate flood risk, such as areas of green space that can be allowed to

flood, therefore alleviating the pressure elsewhere.

- It will be important that there is a strategic consideration of the current importance of the river as a wildlife corridor and what potential / opportunities there are so that action can be targeted towards certain types of habits / species / management regimes.

How has the Policy changed?

- The Policy has changed from a Core Policy to a Development Management Policy. This was Policy CP7 at the preferred options stage.

Have the recommendations been taken on-board?

- No

What are the sustainability implications of the changes made?

- N/A
- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09)

Are there any outstanding comments / recommendations?

- There should be a reference to the flood risk associated with the River Dour and whether there is any potential for land uses that might mitigate flood risk, such as areas of green space that can be allowed to flood, therefore alleviating the pressure elsewhere.
- It will be important that there is a strategic consideration of the current importance of the river as a wildlife corridor and what potential / opportunities there are so that action can be targeted towards certain types of habits / species / management regimes.

Dover District Council's comments

Forthcoming (see Para. 5.1.4)

DM19 – Historic Parks and Gardens

Findings of Preferred Options SA

Summary

The appraisal found that:

"This Policy identifies historic parks and gardens as being of sufficient importance, and being at significant enough risk, to warrant a separate policy. The Policy will ensure that under no circumstances will there be impacts to historic parks and gardens."

Recommendations

• N/A
How has the Policy changed?
• This was Policy DM24 at the preferred options stage.
Have the recommendations been taken on-board?
• N/A
What are the sustainability implications of the changes made?
<ul style="list-style-type: none"> • N/A • The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09).
Are there any outstanding comments / recommendations?
• N/A
Dover District Council's comments
• N/A

DM20 – Shopfronts

Findings of Preferred Options SA
<p>Summary</p> <p>The appraisal found that:</p> <p>“Shop fronts have been identified as being of sufficient importance to the quality of the built environment as to warrant a separate policy. This Policy will ensure that a strategic, rather than an ad hoc approach is taken to allowing change to shop fronts.”</p>
<p>Recommendations</p> <ul style="list-style-type: none"> • N/A
How has the Policy changed?
• This was Policy DM25 at the preferred options stage.
Have the recommendations been taken on-board?
• N/A

What are the sustainability implications of the changes made?

- N/A
- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM21 – Security Shutters and Grills

Findings of Preferred Options SA

Summary

The appraisal found that:

“Security shutters and grills have been identified as being of sufficient importance to the quality of the built environment as to warrant a separate policy. This Policy will ensure that a strategic, rather than an ad hoc approach is taken to allowing security shutters and grills.”

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM26 at the preferred options stage.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- N/A
- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM22 – Shopping Frontages

Findings of Preferred Options SA

Summary

The appraisal found that:

“Through this Policy the Council recognise that a strategic, rather than an ad hoc approach must be taken to shop frontages to ensure the continued vitality of town centres. It is likely that the retail offer in the town centres is of strategic importance to the regeneration of the town centre.”

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM27 at the preferred options stage.
- This Policy now refers to Sandwich, as well as Deal and Dover.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- There are no strategic sustainability implications of the changes made and therefore no requirement to reappraise this Policy against the SA framework. The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM23 – Local Shops

Findings of Preferred Options SA

Summary

The appraisal found that:

“This Policy will reduce the need to travel for people in rural communities and for workers on major employment sites. Access to local shops can be particularly important for local communities as without such provision an alternative retail outlet might be some distance away. A local shop can have a significant effect in terms of sustaining a local community, particularly in rural areas.”

Recommendations

- N/A

How has the Policy changed?

- This was Policy DM29 at the preferred options stage.

Have the recommendations been taken on-board?

- N/A

What are the sustainability implications of the changes made?

- N/A
- The appraisal against the framework can be found in the Preferred Options SA Report, available at <http://www.dover.gov.uk/localplanreview/corestrategy.asp> (accessed 01/09).

Are there any outstanding comments / recommendations?

- N/A

Dover District Council's comments

- N/A

DM24 – Retention of Rural Shops and Pubs

Findings of Preferred Options SA

Summary

The appraisal found that:

“Local pubs and shops can be very important elements of cohesive rural communities. This Policy seeks to ensure that loss of these features can not occur unnoticed. In doing so it should play a role in attempts to maintain and regenerate small communities. Furthermore, rural shops can provide an important service, particularly for people in rural areas who do not have access to a car.”

Recommendations
• N/A
How has the Policy changed?
• This was Policy DM30 at the preferred options stage.
Have the recommendations been taken on-board?
• N/A
What are the sustainability implications of the changes made?
<ul style="list-style-type: none"> • N/A • The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09).
Are there any outstanding comments / recommendations?
• N/A
Dover District Council's comments
• N/A

DM25 – Open Space

Findings of Preferred Options SA
<p>Summary</p> <p>The appraisal found that:</p> <p><i>"This Policy should adequately ensure that the open space resource is not depleted unless there are overriding reasons. Access to open space is very important for public recreation and health. It is noted that this Policy promotes the protection of open space rather than provision of new open spaces. However, there is the potential for a strategic approach to targeting open space to ensure that the open space network is more accessible to, maximises its biodiversity value and promotes links with the countryside."</i></p>
<p>Recommendations</p> <ul style="list-style-type: none"> • There should be a strategic approach to the provision of a network of multifunctional open space, green space and river corridors.

How has the Policy changed?
<ul style="list-style-type: none">• This was Policy DM31 at the preferred options stage.
Have the recommendations been taken on-board?
<ul style="list-style-type: none">• N/A
What are the sustainability implications of the changes made?
<ul style="list-style-type: none">• N/A• The appraisal against the framework can be found in the Preferred Options SA Report, available at http://www.dover.gov.uk/localplanreview/corestrategy.asp (accessed 01/09).
Are there any outstanding comments / recommendations?
<ul style="list-style-type: none">• N/A
Dover District Council's comments
<ul style="list-style-type: none">• N/A

6 Conclusions, Mitigation and Monitoring

6.1 Introduction

6.1.1 This chapter aims to bring together the main findings of the SA. Firstly, some concluding thoughts are made regarding the sustainability of the Core Strategy as a whole. In particular, the discussion takes account of how the Core Policies and Development Management Policies will come together to deliver the growth strategy, and takes account of any cumulative effects. Following this, **Table 15** sets out a consideration of cumulative effects. Finally, **Table 16** sets out the key recommendations alongside suggestions for monitoring.

6.1.2 Monitoring significant effects is a key requirement of the SEA Directive:

The SEA Directive states that 'member States shall monitor the significant environmental effects of the implementation of plans and programmes'.

Article 10, the SEA Directive

'Monitoring allows the actual significant effects of implementation of the SPD to be tested against those predicted in the SA'.

Section 4.3.21, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

6.2 Conclusions

6.2.1 The strategy distributes 14,000 dwellings, as opposed to the 10,000 dwellings that were distributed by the corresponding policy at the Preferred Options stage. The extra 4000 dwellings have been allocated to Dover, so that it will now receive 70% of future housing development in the District, as opposed to the 57% that was proposed at the Preferred Options stage. The Submission Core Strategy describes Dover as a *"town with a positive international profile but is under-performing for local people and visitors. Yet it has great natural and cultural assets that can be used more effectively."*

6.2.2 The increase in housing development and focus of the housing in Dover is likely to effectively address existing housing needs in the District, as well as make the District's housing offer more attractive and so attract and retain economically active and skilled people in the District. However, there are housing needs in other areas of the District other than Dover. There is also a need to ensure that affordable housing needs are met through integrating affordable housing within new communities, as well as bringing forward new affordable housing in areas currently in need of regeneration. Developers will be keen to build market housing, and it is up to the Council to ensure that funds also come forward for well targeted affordable housing.

- 6.2.3 The increased housing promoted will make it likely that economic forecasts can be realised through increased inward investment, business start-ups etc. The strategic allocations as well as the knock-on benefits of external investment in the District will also help to bring about regeneration in Dover, therefore addressing the deprivation inequalities that exist in the District and reversing the trend of decline in service provision.
- 6.2.4 Public realm improvements and investment in transport infrastructure in the District will be important to ensure that growth leads to more sustainable transport patterns, focused on walking, cycling and use of public transport. Allowing more people to live and work in Dover, as well as meet a greater range of their needs locally, is likely to be the most sustainable option in terms of reducing the need to travel. The phasing of housing and employment development, as well as the timely delivery of infrastructure will also have important implications in terms of promoting more sustainable transport patterns. The SA Report at the Preferred Options stage identified that there is a risk of employment and commercial development not keeping in step with housing delivery, which could result in decreased access to employment and an increased need for commuting. However, the Delivery Framework included as part of the Submission Core Strategy sets out the need to: create jobs in the District; regenerate Dover Town Centre; and ensure infrastructure is in place either before or in tandem with housing.
- 6.2.5 The Submission Core Strategy states that, while land for up to 14,000 homes will be allocated, the target is to complete a minimum of 10,100 by the end of 2026, consistent with the emerging Regional Spatial Strategy (RSS). This clear long-term perspective should give developers the certainty that they require when considering whether to invest in the District. Furthermore, this provides flexibility, i.e. a local planning framework in place should house builders be in a position to deliver housing faster, or the RSS requirements be reviewed. Phasing delivery over the long-term, rather than intensive development in the short-term, should also allow an emphasis in early years on infrastructure delivery, identification of affordable housing need and development of skills. Extending the plan period beyond 2026 should also mean building some of the proposed developments later, thus making them subject to stricter building regulations. Delaying development – particularly on land at Whitfield – could also reduce the air pollution impacts of development, as vehicle technology is set to improve significantly.
- 6.2.6 Air pollution does, however, remain a constraint to development at Dover. Further development certainly has the potential to worsen the current situation, although there is plenty of scope to mitigate effects. Air pollution can be particularly bad when the port is not functioning properly and traffic tails back through the town. This is an exceptional occurrence rather than the norm, but is an important strategic consideration none the less.
- 6.2.7 More generally, higher levels of development will inevitably result in negative effects in terms of some sustainability objectives. Higher growth will lead to greater resource use (notably water consumption, waste production and greenfield land-take), more pollution, and more impacts on landscape and biodiversity. Greenhouse gas emissions (GHG) associated with buildings will increase overall until level 6 of the Code for Sustainable Homes (and BREEAM equivalent) is reached at which time they may plateau.
- 6.2.8 However, the Council have developed strong mitigatory measures. In particular, Policies have been developed taking account of robust local evidence base studies into the potential for sustainable design and construction and water efficiency measures. A Green Infrastructure

network has been developed and is promoted through policy. It will be important that this is developed into a robust strategy and taken forward through the Delivery Plan.

- 6.2.9 Infrastructure will also be key to avoiding and mitigating negative effects of growth. The funding streams afforded by Growth Point status should allow for closer links between planning and infrastructure delivery and the strategy will lead to a large amount of funds becoming available through developer contributions, the allocation of which will be determined by a forthcoming Supplementary Planning Document (SPD). The Submission Core Strategy now lists a wide range of essential infrastructure projects that must come forward. These infrastructure projects are listed under a range of key headings, demonstrating that community and green infrastructure is being considered alongside (and of equal importance to) traditional infrastructure delivery. There is also now a Delivery Framework, which should lead to infrastructure delivery being planned for in an appropriate way. It is felt that this is a very transparent approach towards planning for infrastructure.
- 6.2.10 The large amount of development promoted through this Policy will lead to socio-economic benefits for the District as a whole, but will increase the potential for some existing residents to lose out as a result of nearby development causing disruption. Careful planning will be required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities.
- 6.2.11 This Policy promotes a development of at least 5750 dwellings at Whitfield, considerably more than the 1,800 dwellings promoted by the corresponding Policy at the preferred options stage. This Policy promotes development to the west of Whitfield, where as the corresponding Policy at the preferred options stage did not. However, it is now recognised that even a smaller quantum of development (as promoted at the preferred options stage) would have required development to the west as well as to the east of Whitfield.⁹
- 6.2.12 Delivering a large amount of growth at Whitfield, as promoted by the growth strategy, has a range of strategic sustainability implications. Development of this land raises the need for substantial infrastructure (in particular transport, health and education). The development is of a size where major investment in infrastructure can be funded through the development. Whitfield, due to its size and location, has been identified in the Renewable Energy and Sustainable Construction Strategy as a site suitable for early adoption of exemplary CO2 reduction targets. It is also expected that there will be good opportunities to access services, facilities and employment in Whitfield and Dover Town Centre by walking cycling and public transport, therefore helping residents to reduce their carbon footprints.
- 6.2.13 However, land to the west of Whitfield is less physically contained in the landscape, being a relatively flat expanse of agricultural land open to some long distance views of the coast. There is the need to ascertain just how closely associated the landscape is to the important downland a short distance to the west. The area also includes ancient woodland and listed buildings.
- 6.2.14 Increasing the quantum of development at Whitfield has the potential to increase negative impacts on the existing local community. The community will be affected during the construction

⁹ At the time of the Preferred Options consultation it was thought that 10,000 homes could be delivered without having to develop to the west of Whitfield. However, this was assuming that windfall sites would be included in this figure. Since this time, the Council has learnt that in fact it would have had to deliver 10,000 homes *in addition* to windfall sites.

phase, which could last a number of years. Furthermore, residents will lose ease of access to the surrounding countryside. However, the Policy includes strong wording to ensure that negative impacts on the existing community are minimised and that they benefit in a number of respects.

- 6.2.15 The growth allocated to **Deal** is currently described in the Submission Core Strategy as being of “*lower order geared around meeting local rather than strategic needs.*” However, it is stated that this is “*subject to the outcome of further investigation of the North Deal area.*” The Core Strategy Vision states that “*Deal may have a larger role to play in contributing to the growth strategy if the constraints of the north Deal area can be overcome and the potentials realised.*” It is envisioned that any further development at North Deal, if identified by further studies as being appropriate, would be taken forward through an Area Action Plan (AAP).
- 6.2.16 The North Deal area is associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour. This part of Deal is poorly served in terms of youth, health and community facilities and as it was associated with the former colliery it has been included into the National Coalfields Programme to aid rejuvenation. However, the northern part of Deal, and the countryside between Deal and Sandwich, is subject to the risk of tidal flooding which is a constraint on development. Also, much of the countryside is environmentally sensitive, with areas of that are internationally important in terms of biodiversity.

Timescale of impacts

- 6.2.17 The Submission Core Strategy sets out a detailed time-scale for action. It identifies that housing growth is unlikely to reach maximum levels before 2016, and some of the planned housing growth will not come forward before 2026. As described above, there could be a range of sustainability benefits to ensuring that development comes forward at a slow and steady rate, with plenty of lead in time. However, it is also important to remember that there are social-economic issues in the District currently, which will need addressing as a priority, and will not be able to wait until regeneration is complete.

Final comments

- 6.2.18 SA is essentially about promoting and facilitating good planning. This plan shows many aspects of good planning. In particular, the plan shows good governance through the inclusion of detailed and helpful background information and discussion explaining the reasoning for the decisions that have been made. The plan has been developed in an iterative fashion, including through taking account of the findings of sustainability appraisal. The Council's comments relating to how the SA recommendations have been taken on-board, and responses to outstanding recommendations can be seen in this SA Report.
- 6.2.19 Overall, this plan is clearly driven by achieving benefits in terms of the socio-economic pillars of sustainability in the relatively short-term. However, strong mitigatory measures are in place to ensure that this does not result in unacceptable risk of significant and/or irreversible negative effects. Mitigatory measures include ambitious commitments to infrastructure delivery. A number of evidence base studies have been undertaken, and have informed the development of this Core Strategy, particularly in terms of sustainable design and construction, water resources and green infrastructure. It will be important that strategies are developed further and have a real

effect on planning. There may be a need to develop SPDs to ensure a suitably proactive approach to minimising adverse effects and ensuring positive effects in certain areas.

Cumulative effects

Table 15: Cumulative assessment

SA Objective	Cumulative effects
To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	<p>The strategic allocation Core Policies are all focused on Dover. This is where the greatest housing need exists (particularly in terms of acute housing need), but there are also issue of affordability and housing need elsewhere in the District.</p> <p>Many effects on housing need will be determined by the way in which financial contributions for affordable housing are sought from developers who seek to build market housing in the district. This topic is addressed by Policy DM5, but will require further attention in an SPD.</p>
To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	<p>One of the strategic allocations is coastal (Dover Waterfront), and it will be important to consider whether the intensification of land-use at this area (which also has fluvial influences associated with the River Dour) leads to increased flood-risk on or off-site. Furthermore, there are important flood risk considerations associated with River Dour at Mid-Town, which is another area allocated a strategic level of development in the Submission Core Strategy.</p> <p>Elsewhere along the coast the Green Infrastructure Network identifies important areas where there is a need to enhance and recreate natural wetlands with the aim of reducing flood risk (and adapting to increasing sea levels). Taking such a long-term view should lead to a presumption against development that could hinder the ability to adapt in the future. However, there may be some development pressure North of Deal in the future.</p> <p>In terms of fluvial flooding, it will be important to ascertain whether Whitfield and/or the other developments that are allocated through the Site Allocations DPD, do not have a cumulative effect on the ability of catchments to 'hold' water, therefore increasing down-catchment / down-stream flood-risk.</p>
To improve the health and well-being of the population and reduce inequalities in health	<p>A number of Policies, including Policy CP4 and the strategic allocations, have a focus on improving the public realm in Dover, which will be important in terms of improving health and well-being. There is</p>

	also a focus on increasing connectivity within Dover, so that it might become more conducive to walking and cycling. Furthermore, a number of new health facilities are listed amongst the new infrastructure that will be required to support the growth strategy.
To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	The strategic allocations as well as the knock-on benefits of external investment in the District will also help to bring about regeneration in Dover, therefore addressing the deprivation inequalities that exist in the District and reversing the trend of decline in service provision. A number of other Policies should support regeneration, including those that promote a high quality and accessible public realm and green infrastructure.
To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	CP2 sets out the expectation that a large amount of new jobs and retail floor-space alongside the new housing. The Policies also act to ensure that development is concentrated in Dover, therefore allowing the maximum number of people to live and work in close proximity, but also ensuring that necessary development can come forward in other areas, including the rural area.
To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	Some of the development in Dover will require mitigation measures to ensure that homes are not being built in areas where people's health could be at risk from air pollution. More generally, the net effect of the growth strategy will be to increase the number of cars on the roads and therefore potentially worsen air pollution in the short-term, but there is also a big focus on making Dover more accessible to walking and cycling and improving bus-services. As a result, per capita emissions may decrease.
To conserve and enhance biodiversity	The growth strategy will lead to the potential for negative impacts on valued and biodiversity rich countryside around Dover. Much of this is of international importance, and so the potential for significant effects has been given specific consideration through a separate Habitat's Regulations Assessment. There is also the potential for some impacts on biodiversity that is of more local value (the greenfield landtake surrounding Whitfield, and the potential for impacts on Linacre Wood – an ancient woodland – being the primary example.) Strong mitigatory measures have been developed, in particular the Green Infrastructure Network, and plans for Whitfield and Connaught Barracks that seek to provide areas that should act as an alternative to

	making use of sensitive biodiversity rich areas for recreation.
To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	<p>The Connaught Barracks development has been planned in an iterative fashion with the involvement of key stakeholders in an effort to ensure that the most appropriate approach is taken to maintaining the historic value of the site.</p> <p>More generally, the AONB should not be directly affected, although there is the potential that development to the west of Whitfield could have an erosional effect on countryside and landscape character (although strong mitigatory measures are set to be put in place to minimise any impact).</p>
To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	<p>Cumulatively, the Submission Core Strategy performs very well in terms of this objective. Concentrating growth at Dover should allow more people to be able to access services, facilities and work locally, and there are also policies set out in the strategic allocations to ensure that Dover becomes more accessible by sustainable modes of travel.</p> <p>The introduction of the high speed rail service should allow people to commute from Dover by train.</p>
To create a high quality built environment	<p>Policy CP4 has been strengthened considerably since the preferred options stage, and should now go some way to ensuring development comes forward in a way that leads to the building of high quality environments. Specific masterplanning and design guidance is also set out in the strategic allocations.</p>
To promote sustainable forms of development and sustainable use of natural resources	<p>Policy CP5 promotes ambitious sustainable design standards, which are further added to through the strategic allocation policies. There is, however, be the potential for Central Government Policy relating to this topic to evolve quickly and become more stringent. It will therefore be important that there is a degree of flexibility built in to ensure that Dover District always seeks a tailored and ambitious approach that sets it apart.</p>
To encourage high and stable levels of employment and sustain economic competitiveness	<p>The increased housing promoted will make it likely that economic forecasts can be realised through increased inward investment, business start-ups etc. However, it is important to question whether the economic downturn being felt nationally could potentially hinder the ability of Dover District to achieve economic forecasts. DM Policies 2 – 4 also include more specific stipulations relating to when and where employment development may be</p>

	suitable.
To improve the development and retention of skills	Improving and diversifying the housing offer in Dover will have the effect of attracting new, more highly skilled people to the District. Furthermore, it is likely that regeneration and increased economic activity will lead to better prospects for existing residents and their families to build on their skills and access new areas of work. It is notable that the South Kent College has identified the Mid-town as the preferred location for a new campus.
To ensure that development and benefits everyone in the District	Delivering 14,000 new homes in the District clearly has the potential to impact upon the existing population, and could potentially create a social divide between those who have always lived in the District, and those who have moved to the District. However, the strategic allocations do have measures in place that seek to minimise negative impacts on existing residents, and ensure that they will benefit in a number of respects.

6.3 Mitigation and Monitoring

- 6.3.1 **Table 16** summarises out the recommendations alongside suggestions for monitoring. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

Table 16: SA recommendations for mitigation, plan enhancement and monitoring

Policies and recommendations	Monitoring suggestions
CP1 – Settlement Hierarchy	
• N/A	• N/A
CP2 - Provision for Jobs and Homes between 2006 – 2026	
<ul style="list-style-type: none"> It will be important to take account of climate change and sea level rise. As well as predicting the effects of rising sea levels, it will also be important to consider how climate change could lead to the need for land intensive responses, such as managed retreat and the creation of wetland habitat along the coast and river valleys. These responses could be driven by national or regional policy in the future, and should be considered through spatial planning now. It will be important that such future contingencies are considered for the low lying land to the north of Deal. There is more reference made to flood risk in the Submission Core Strategy, than was the case at the preferred options stage, but this remains an important consideration. Development in the floodplain is clearly an important issue, and there should also be efforts made to ensure that there are not cumulative effects of development, through altering drainage and infiltration patterns, which result in increased 'off-site' flood-risk. Although there is a Policy dedicated to maintaining the integrity of the Green Infrastructure Network, it is possible that this could also be supplemented by a DM Policy relating to biodiversity, perhaps suggesting ways in which biodiversity should be designed into development. The Green Infrastructure Network should be developed and implemented in consultation with key stakeholders. The local Wildlife Trust would seem to be an ideal candidate, as they can seek to put into practice 'living landscape' principles, through proactive engagement with spatial planning. Natural England may also want to be involved, particularly as they can ensure that landscape character and the protection of the Natura 2000 network are integrated into the green infrastructure strategy. Ideally, green infrastructure would be planned for in a way that takes into account 	<ul style="list-style-type: none"> It will be important to monitor progress with implementing the Green Infrastructure Network, and monitor how it develops into a more integrated strategy over time (i.e. one that engages with wider stakeholders and policy). It will be important to monitor socio-economic change in communities that currently suffer from relative deprivation, to ascertain whether opportunities for upward mobility increase. It will be important to monitor the messages that are coming from water and energy strategies, to ascertain whether there are patterns, and perhaps opportunities for more strategic direction to be given. It will be important to monitor the delivery of infrastructure through the Delivery Plan. It will be important to keep close contact with existing residents in areas experience the most significant change, particularly Whitfield.

<p>landscape character and historic landscape character.</p> <ul style="list-style-type: none"> • The Core Policies no longer makes reference to 'smart growth', although smart growth is referred to as a monitoring indicator. The Council should comment on the continued relevance of Smart Growth and state how the objectives of 'smart growth' will be achieved through the Core Strategy. • There is no over-arching Policy relating to water efficiency in the Submission Core Strategy, although it is recognised that the findings of the evidence base studies relating to water have been integrated into the Sustainable Construction Policy and a requirement for water strategies to be drawn up for two of the four strategic allocations. • It will be important that the Delivery Plan (which will enact the Delivery Framework) is regularly updated and made available to key stakeholders. • Careful planning is required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities. 	
CP3 – Distribution of housing allocations	
<ul style="list-style-type: none"> • New housing, particularly in Dover, must act as a catalyst for wider regeneration in the town and not simply gentrification. This can be partly facilitated through careful use of Section 106 monies. Such monies should be channelled from greenfield development into housing renewal in the older parts of Dover. • Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality • It will be important that a full range of indirect effects on the biodiversity resource are considered. This should include a consideration of how habitats come together functionally within a landscape. So, for example, internationally or nationally important habitat may be functionally connected to other non-designated or perhaps locally designated habitat in the wider landscape. 	<ul style="list-style-type: none"> • It will be important to monitor how monies collected through developer contributions are contributing to meeting affordable housing need in the District. • It will be important to monitor air pollution within AQMAs and other areas where air quality may be at risk of worsening. • It will be important to consider the potential for further strategic landscape studies to be undertaken in the District, potentially allowing landscape to be integrated with green infrastructure.

<ul style="list-style-type: none"> • It will be important to maintain the integrity of landscape character, and ensure that it is not eroded. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character. • It will be important to ensure that existing residents do not suffer as a result of the major construction activity and more general change that will occur over the plan period. Careful phasing will be important to reduce in-combination impacts. 	
CP4 - Housing Quality, Mix, Density and Design	
<ul style="list-style-type: none"> • It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities. 	<ul style="list-style-type: none"> • It will be important to monitor the composition of new communities.
CP5 – Sustainable Construction Standards	
<ul style="list-style-type: none"> • The Council should consider requiring homes to meet CfSH Level 6 by 2016. • The Council should comment on the potential for developers to push through planning applications before the adoption of the Core Strategy, in an attempt to avoid having to meet sustainable construction standards. • The Council should consider whether it would be beneficial to include a presumption that requirements are met on-site, rather than in a commensurate fashion, wherever possible. • The statement regarding commuted payments from those buildings that do not meet standards on-site requires considerable attention (presumably through an SPD) to ensure that this does not provide a loophole for developers to lessen their spend on sustainable construction. • The Council should set out their justification for choosing a threshold of 1000m² for non-residential buildings. • The Council should comment on the potential for this Policy to act as a means to reject planning permission, even in circumstances where the proposal meets building regulations. 	<ul style="list-style-type: none"> • It will be important to monitor application of the Code for Sustainable Homes and BREEAM.

CP6 - Infrastructure	
<ul style="list-style-type: none"> • It will be important that community infrastructure becomes more equally distributed amongst the communities of the District. This may mean that new infrastructure is targeted in a way that seeks to re-dress existing inequalities as well as being delivered alongside new development. • It will be important that the Development Contributions Supplementary Planning Document promotes an integrated, rather than a piecemeal approach to provision of community infrastructure. An integrated approach would consider the multifunctional value of community infrastructure, for example, recognising that open space can be important for mental and physical health, community cohesion and biodiversity. • It will be important that measures to alleviate flood risk are considered as an essential infrastructure requirement that must be in place and functional prior to development. This might include hard flood defences. However, it might also mean undertaking a softer approach such as implementing a sustainable drainage system. This type of infrastructure may blur the distinction between a physical and community service, and so it is important that this is not overlooked. • There is a need to be clear about how the Strategic Housing Market Assessment will guide affordable housing delivery. 	<ul style="list-style-type: none"> • It will be important to monitor the delivery of infrastructure through the Delivery Plan.
CP7 – Green Infrastructure	
<ul style="list-style-type: none"> • The green infrastructure network should be designed and implemented in such a way that there are multifunctional benefits. • It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside. 	<ul style="list-style-type: none"> • It will be important to monitor progress with implementing the Green Infrastructure Network, and monitor how it develops into a more integrated strategy over time (i.e. one that engages with wider stakeholders and policy).
CP8 – Dover Waterfront	
<ul style="list-style-type: none"> • It is felt that a precautionary approach would be to assume that there will be some degree of flood risk and to begin to consider how this risk will be mitigated at an early stage, pending the findings of the 	<ul style="list-style-type: none"> • It will be important to monitor the number of homes that are built in areas of flood risk. • It will be important to monitor air pollution

<p>FRA. In particular, it is recommended that design should be promoted that is functional, if not resistant to flooding, rather than design that is only aesthetically pleasing, as is the current emphasis of the Policy and supporting text.</p> <ul style="list-style-type: none"> • Air pollution will be a significant consideration as it has the potential to affect the health of those who live and work in the new development. Air pollution should be a consideration when developing the masterplan. 	<p>within AQMAs and other areas where air quality may be at risk of worsening.</p>
CP9 – Mid-Town, Dover	
<ul style="list-style-type: none"> • Further consideration could be given to means of discouraging access to the area by private car. • It will be important that the full range of interest groups in the town centre are consulted at an early stage before determining the scale and type of development that is most suitable for the Mid Town. • Flood risk and drainage issues require further attention in the Mid Town. 	<ul style="list-style-type: none"> • It will be important to monitor travel patterns
CP10 – Connaught Barracks, Dover	
<ul style="list-style-type: none"> • It will be important that the site includes a mix of housing. It may be that the role of housing at the site should be to increase the proportion of upper end market housing in the District, as is currently promoted by the Policy. However, the potential for low cost market housing to add to the housing mix should be considered. 	<ul style="list-style-type: none"> • It will be important to monitor the composition of new communities.
CP11 – The managed expansion of Whitfield	
<ul style="list-style-type: none"> • The Council should expand upon ways in which the development at Whitfield will contribute to meeting the affordable housing need in Dover. • The Council should comment on what benefits can be expected as a result of the link between the A2 and A256 north of Whitfield, including benefits for existing residents. • The Council should comment on how 'neighbourhood centres' compare to a 'local centre' • The Council should consider taking onboard the recommendation of the Dover District Renewable 	<ul style="list-style-type: none"> • It will be important to monitor how monies collected through developer contributions are contributing to meeting affordable housing need in the District. • It will be important to monitor the composition of new communities. • It will be important to monitor application of the Code for Sustainable Homes and BREEAM. • It will be important to keep close contact with existing residents in areas experience the

<p>Energy and Sustainable Construction Study that housing should 'aspire to' CfSH Level 5 with immediate effect. This will be particularly important as little housing will come forward in Whitfield in the near future, and so it may be that CfSH Level 5 is more achievable by the time that housing does come forward.</p> <ul style="list-style-type: none"> • Lenacre Wood must be an integral part of a local green infrastructure network, which is aimed at optimising ecological permeability across the area, as well as allowing access by residents of Whitfield. • It will be important to consider whether this landscape contributes to or 'supports' the overall landscape character of the Kent Downs. • There must be early commitment to exemplary sustainable design and construction standards and particularly CO2 reduction and water efficiency targets in Whitfield. It is notable that the development will be of a similar size to a number of the proposed Ecotowns, and so the Ecotowns Planning Policy Statement, and the proposals being put together by the development proponents, could be taken into account when planning the expansion of Whitfield. • It will be important that the Council takes on board the findings of the Water Cycle Strategy in terms of how to minimise water use in the built environment and ensure that the vulnerable water resources associated with the area are protected from pollution. • The Council should take the opportunity to expand on measures that will be in place to minimise impacts on the existing community. 	<p>most significant change, particularly Whitfield.</p>
DM1 – Settlement boundaries	
• N/A	• N/A
DM2 – Protection of Employment Land and Buildings	
• N/A	• N/A
DM3 – Commercial Buildings in the Rural Area	
• N/A	• N/A

DM4 – Re-Use or Conversion of Rural Buildings	
<ul style="list-style-type: none"> It will be important to ensure that there are no cumulative effects on any particular rural community or rural landscape as a result of the incremental conversion of rural buildings away from traditional uses. Traditional uses should also be encouraged where they may remain feasible. 	<ul style="list-style-type: none"> N/A
DM5 – Provision of Affordable Housing	
<ul style="list-style-type: none"> House prices in the District could well rise as a result of High Speed 1 services to London and improved economic performance. Affordable housing policy should therefore be kept under careful review. The Council should comment on whether the new caveat included as part of the affordable housing policy could potentially decrease the likelihood of housing need, and particularly acute housing need, being met in the District. 	<ul style="list-style-type: none"> It will be important to keep all aspects of housing affordability under close review.
DM6 – Rural Exception Affordable Housing	
<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
DM7 – Provision for Gypsies, Travellers and Travelling Showpeople	
<ul style="list-style-type: none"> These statements could possibly be less specific and more strategic and aspirational. However, it is recognised that they must serve the purpose of criteria that can be used to guide the location of pitches. Consider merging the third and fourth points and instead include another point that will ensure that sites are broadly beneficial to the Gypsy and Traveller community (perhaps drawing on the points made under the 'Sustainability' heading in Government Circular 01/06/2006). It will be important that the Gypsy and Traveller site allocations document gives consideration to the full range of effects on the settled and travelling community that can result from the decision of where to locate Gypsy and traveller sites. 	<ul style="list-style-type: none"> It will be important to monitor the well-being of Gypsies and Travellers.

DM8 – Replacement Dwellings in the Countryside	
• N/A	• N/A
DM9 – Accommodation for Dependent Relatives	
• N/A	• N/A
DM10 – Self-contained Temporary Accommodation for Dependent Relatives	
• N/A	• N/A
DM11 – Location of Development and Managing Travel Demand	
• N/A	• N/A
DM12 – Road Hierarchy and Development	
• N/A	• N/A
DM13 – Parking Provision	
• N/A	• N/A
DM14 – Roadside Services	
• N/A	• N/A
DM15 – Protection of the Countryside	
<ul style="list-style-type: none"> It will be important that the Site Allocations DPD takes account of countryside character beyond simply considering the location of the AONB and also considers the potential for cumulative effects on countryside character. The Council should comment on how countryside character might be judged. 	<ul style="list-style-type: none"> It will be important to consider the potential for further strategic landscape studies to be undertaken in the District, potentially allowing landscape to be integrated with green infrastructure.
DM16 – Landscape Character	
• N/A	• N/A
DM17 – Groundwater Source Protection	
• N/A	• N/A

DM18 – River Dour	
<ul style="list-style-type: none"> • There should be a reference to the flood risk associated with the River Dour and whether there is any potential for land uses that might mitigate flood risk, such as areas of green space that can be allowed to flood, therefore alleviating the pressure elsewhere. • It will be important that there is a strategic consideration of the current importance of the river as a wildlife corridor and what potential / opportunities there are so that action can be targeted towards certain types of habits / species / management regimes. 	<ul style="list-style-type: none"> • N/A
DM19 – Historic Parks and Gardens	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM20 – Shopfronts	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM21 – Security Shutters and Grills	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM22 – Shopping Frontages	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM23 – Local Shops	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM24 – Retention of Rural Shops and Pubs	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
DM25 - Open Space	
<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A

Summary of monitoring suggestions

- It will be important to monitor progress with implementing the Green Infrastructure Network, and monitor how it develops into a more integrated strategy over time (i.e. one that engages with wider stakeholders and policy).
- It will be important to monitor socio-economic change in communities that currently suffer from relative deprivation, to ascertain whether opportunities for upward mobility increase.
- It will be important to monitor the messages that are coming from water and energy strategies, to ascertain whether there are patterns, and perhaps opportunities for more strategic direction to be given.
- It will be important to monitor the delivery of infrastructure through the Delivery Plan.
- It will be important to keep close contact with existing residents in areas experience the most significant change, particularly Whitfield.
- It will be important to monitor air pollution within AQMAs and other areas where air quality may be at risk of worsening.
- It will be important to consider the potential for further strategic landscape studies to be undertaken in the District, potentially allowing landscape to be integrated with green infrastructure.
- It will be important to monitor how monies collected through developer contributions are contributing to meeting affordable housing need in the District.
- It will be important to monitor application of the Code for Sustainable Homes and BREEAM.
- It will be important to monitor the delivery of infrastructure through the Delivery Plan.
- It will be important to monitor travel patterns
- It will be important to monitor the composition of new communities.
- It will be important to keep all aspects of housing affordability under close review.
- It will be important to monitor the well-being of Gypsies and Travellers.

7 Next Steps

7.1 Consultation

- 7.1.1 To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the Submission Core Strategy prior to Examination in Public. This SA Report will go for consultation alongside the Plan, so that it might facilitate more informed consultation responses.
- 7.1.2 Following consultation, the Council the plan will be submitted to the Government for approval. The approval process involves a public examination held by a Planning Inspector. The Inspector has the power to approve the Document, with or without alteration, or reject it. The Inspector will be able to refer to the Council's responses the recommendations set out in this SA Report, which will be made following this current consultation.

7.2 SEA Statement

- 7.2.1 Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it – in this case the Council - to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public "are informed and the following items are made available to those so informed:

- (a) the plan or programme as adopted;
- (b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and
- (c) the measures decided concerning monitoring [of the plan]

(Annex 9(1))

- 7.2.2 In light of this requirement, the Council should prepare an SEA / SA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

Appendix I – SEA Checklist

Quality assurance is an important element of the appraisal exercise. It helps to ensure that the requirements of the SEA Directive are met, and show how effectively the appraisal has integrated sustainability considerations into the plan-making process.

Guidance checklist	Chapter	Carried out by
<ul style="list-style-type: none"> The plan's purpose and objectives are made clear. 	3	Scott Wilson
<ul style="list-style-type: none"> Sustainability issues, including international and EC objectives, are considered in developing objectives and targets. 	2	Scott Wilson
<ul style="list-style-type: none"> SA objectives are clearly set out and linked to indicators and targets where appropriate. 	2	Scott Wilson
<ul style="list-style-type: none"> Links with other related plans, programmes and policies are identified and explained. 	2	Scott Wilson
<ul style="list-style-type: none"> Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report. 	Scoping Report	Scott Wilson
<ul style="list-style-type: none"> The appraisal focuses on significant issues. 	Scoping Report and Section 2	Scott Wilson
<ul style="list-style-type: none"> Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. 	Scoping Report	Scott Wilson
<ul style="list-style-type: none"> Reasons are given for eliminating issues from further consideration. 	Scoping Report	Scott Wilson
<ul style="list-style-type: none"> Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. 	Plan Documents and Section 3 and 5	Scott Wilson
<ul style="list-style-type: none"> Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant 	2	Scott Wilson
<ul style="list-style-type: none"> The sustainability effects (both adverse and beneficial) of each alternative are identified and compared 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Inconsistencies between the alternatives and other relevant plans, programmes or policies 	5 and 6	Scott Wilson

are identified and explained.		
<ul style="list-style-type: none"> Reasons are given for selection or elimination of alternatives. 	Plan Documents and Section 3 and 5	Scott Wilson
<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan are described. 	2	Scott Wilson
<ul style="list-style-type: none"> Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable. 	2	Scott Wilson
<ul style="list-style-type: none"> Difficulties such as deficiencies in information or methods are explained. 	Scoping Report	Scott Wilson
<ul style="list-style-type: none"> Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Likely secondary, cumulative and synergistic effects are identified where practicable. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Inter-relationships between effects are considered where practicable. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Methods used to evaluate the effects are described. 	4	Scott Wilson
<ul style="list-style-type: none"> Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated. 	5 and 6	Scott Wilson
<ul style="list-style-type: none"> Issues to be taken into account in development consents are identified. 		NA
<ul style="list-style-type: none"> Is clear and concise in its layout and presentation. 	All	Scott Wilson
<ul style="list-style-type: none"> Uses simple, clear language and avoids or explains technical terms. 	Non-technical Summary	Scott Wilson
<ul style="list-style-type: none"> Uses maps and other illustrations where appropriate. 	All	Scott Wilson

• Explains the methodology used.	All	Scott Wilson
• Explains who was consulted and what methods of consultation were used.	Scoping Report and Section 7	Scott Wilson
• Identifies sources of information, including expert judgement and matters of opinion.	Scoping Report and Section 2	Scott Wilson
• Contains a non-technical summary.	Yes	Scott Wilson
Consultation		
• The SA is consulted on as an integral part of the plan-making process.	Yes, see Section 7	Scott Wilson,
• The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	Yes	Scott Wilson,
• The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	Yes	Dover District Council
• An explanation is given of how they have been taken into account.	Section 5 and Forthcoming SEA Statement	Dover District Council
• Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.	Plan	Dover District Council
• Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA.	6	Scott Wilson
• Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.	Forthcoming	
• Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may include predictions which prove to be incorrect.)	Forthcoming	
• Proposals are made for action in response to significant adverse effects.	Forthcoming	

Appendix II – Appraisal Matrices

Policy CP2 – Provision for Jobs and Homes between 2006 - 2026			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	++	<p>This Policy will have the effect of improving the District's housing offer and delivering more affordable housing. There is affordable housing need spread throughout the District, including in Sandwich and the rural area. However, the District also has a considerable stock of unfit housing, which is primarily found in Dover.</p> <p>The Policy does not refer to an affordable housing target (where as the preferred options version did), although the affordable housing DM Policy should ensure that an appropriate level and mix of affordable housing is delivered.</p>	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	?	<p>The Strategic Flood Risk Assessment (SFRA) has identified that there is a significant degree of flood risk that must be given consideration, but suggests that development should be able to come forward in a way that avoids risk.</p>	<ul style="list-style-type: none"> • There is more reference made to flood risk in the Submission Core Strategy, than was the case at the preferred options stage, but this remains an important consideration. Development in the floodplain is clearly an important issue, and there should also be efforts made to ensure that there are not cumulative effects of development, through altering drainage and infiltration patterns, which result in increased 'off-site' flood-risk. • It will be important to take account of climate change and sea level rise. As well as predicting the effects of rising sea levels, it will also be important to consider how climate change could lead to the need for land intensive responses, such as managed retreat and the creation of wetland habitat along the coast and river valleys.

			These responses could be driven by national or regional policy in the future, and should be considered through spatial planning now. It will be important that such future contingencies are considered for the low lying land to the north of Deal.
3. To improve the health and well-being of the population and reduce inequalities in health	+	<p>This Policy has the potential to lead to significant regeneration. The greatest need for regeneration and associated health benefits is in Dover.</p> <p>Affordable housing provision is also important for good health in the District.</p> <p>Regeneration and developer contributions associated with house building will also be able to improve health service provision in the area. The Submission Core Strategy lists a number of health facilities that will be delivered as part of the growth strategy.</p> <p>Furthermore, with an influx of people to take up the new jobs, the average age of the population, with probably will decrease, resulting in fewer demands per person on the health services.</p>	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	<p>Growth promoted through this Policy is likely to be on a scale that will trigger regeneration where it is needed. Regeneration will be important to ensure that deprivation and inequalities do not worsen, particularly in Dover.</p> <p>It is likely that housing will be delivered as part of mixed communities, where there is less potential for social exclusion.</p> <p>The Core Strategy Preferred Options Document placed and onus on 'Smart Growth', which should enable more people to become economically active, therefore breaking from cycles of dependency and deprivation. The Submission Core Strategy does not</p>	

		refer to Smart Growth.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	<p>This strategy has the potential to bring with it more services, including shopping and health services. Some would be attracted to the district by the greater number of residents; some would need to be provided through developer contributions.</p> <p>The SA Report at the preferred options stage identified that there is a risk of employment and commercial development not keeping in step with housing delivery, which could result in decreased access to employment and an increased need for commuting. The Delivery Framework, which is included as part of the Submission Core Strategy, sets out the need to create jobs in the District; regenerate Dover Town Centre; and ensure infrastructure is in place before or in tandem with housing is made available.</p>	<ul style="list-style-type: none"> • It will be important that the Delivery Plan (which will enact the Delivery Framework) is regularly updated and made available to key stakeholders.
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	<p>Overall the absolute number of trips by car and lorry, and associated air pollution and greenhouse gas emission, will rise with the increase in households. This may make it more difficult tackle existing problems of air pollution in Dover. However, per capita levels of pollution may well improve.</p> <p>Seeking to carefully phase housing and commercial growth should ensure that more people are able to live and work within Dover, as well as meet a greater range of their wider needs locally, therefore reducing the need to travel. The Delivery Framework, which is included as part of the Submission Core Strategy, sets out the need to create jobs in the District; regenerate Dover Town Centre; and ensure infrastructure is in place before or in tandem with housing is made available.</p>	<ul style="list-style-type: none"> • Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality

		Development Management Policy should assist in minimising the need to travel as well as reducing greenhouse gas emissions from the built environment.	
7. To conserve and enhance biodiversity	-	<p>High levels of growth will increase the probability of significant impacts to biodiversity. Growth in the District has the potential to lead to increased recreational impacts, water use, and wastewater generation, all of which could lead to impacts on biodiversity. However, exact effects will be dependent on location of development, as well as the design/implementation.</p> <p>The Preferred Options Core Strategy included a Development Management Policy setting out the District's approach to protecting and enhancing biodiversity. However, this Policy has been removed from the Submission Core Strategy. However, a strategic green infrastructure plan has now been developed and is promoted through Policy.</p> <p>It should be noted that this assessment discusses the impacts on biodiversity in relatively general terms. It is difficult to identify impacts on specific sites with any certainty. However, this will be the role of the HRA, which will need to consider impacts on individual Natura 2000 sites.</p>	<ul style="list-style-type: none"> Although there is a Policy dedicated to maintaining the integrity of the Green Infrastructure Network, it is possible that this could also be supplemented by a DM Policy relating to biodiversity, perhaps suggesting ways in which biodiversity should be designed into development. The Green Infrastructure Network should be developed and implemented in consultation with key stakeholders. The local Wildlife Trust would seem to be an ideal candidate, as they can seek to put into practice 'living landscape' principles, through proactive engagement with spatial planning. Natural England may also want to be involved, particularly as they can ensure that landscape character and the protection of the Natura 2000 network are integrated into the green infrastructure strategy. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-?	This number of houses will require a large greenfield landtake and would thus inevitably have a negative impact on the countryside. It is likely that the greatest effects will be felt in the countryside directly around the towns, in particular Dover. The extra housing promoted by the Submission Core Strategy document will be delivered on greenfield land surrounding	<ul style="list-style-type: none"> Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.

		<p>Whitfield, north of Dover.</p> <p>Development Management Policy should help to ensure protection of the countryside and landscape character. Also, a strategic green infrastructure plan has now been developed. A coordinated approach to the provision of green infrastructure could potentially ensure the protection of landscape character and historic landscape character.</p>	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	<p>The level of development promoted is likely to increase the overall number of journeys. However, seeking to carefully phase housing and commercial growth should ensure that more people are able to live and work within the District, as well as meet a greater range of their wider needs locally, therefore reducing the need to travel. The Delivery Framework, which is included as part of the Submission Core Strategy, sets out the need to create jobs in the District; regenerate Dover Town Centre; and ensure infrastructure is in place before or in tandem with housing is made available.</p> <p>Rail services are set to improve dramatically when Dover becomes served by the new high-speed services using the Channel Tunnel Rail Link from the end of 2009. This is estimated to reduce the journey time to London by around 30 minutes and bring Dover into a viable commuting time - the District currently has the lowest level of London commuting in Kent. An increase in the number of people choosing to live in the District and commute to London by train will not necessarily be a bad thing for the District.</p>	
10. To create a high quality built environment	+	<p>The development promoted through this Policy has the potential to lead to the regeneration of the District's towns and to help improve the built environment. The strategy will lead to a large</p>	

		amount of funds becoming available through developer contributions, the allocation of which will be determined by a forthcoming Supplementary Planning Document. However, there are some towns – particularly Deal and Sandwich – where the existing built environment is valued and relatively sensitive. In these areas it will be important to ensure that there is capacity to absorb any new development.	
11. To promote sustainable forms of development and sustainable use of natural resources	-	<p>The brownfield land component of the Strategy is below the national target of 60%. The target is, however, an average and by definition there will be areas above and below.</p> <p>The extra housing promoted by the Submission Core Strategy document will be delivered on greenfield land surrounding Whitfield, north of Dover.</p> <p>Total use of natural resources is likely to increase with higher housing numbers; however per capita use shouldn't and may decrease, assuming that higher levels of the Code for Sustainable Homes are phased in.</p>	<ul style="list-style-type: none"> • There is no over-arching Policy relating to water efficiency in the Submission Core Strategy, although it is recognised that the findings of the evidence base studies relating to water have been integrated into the Sustainable Construction Policy and a requirement for water strategies to be drawn up for two of the four strategic allocations.

12. To encourage high and stable levels of employment and sustain economic competitiveness	+	<p>Economic forecasts indicate potential for minimum growth of 4,000 jobs by 2016 plus an additional 2,500 to 2026, provided there is a sufficient supply of appropriately skilled labour. This Policy should ensure that skilled labour is locally available.</p> <p>The Preferred Options SA Report stated that: <i>“Achievement of SMART growth is key to the economy. If SMART growth is not achieved, Scenarios suggest the following mitigation measures: 1. higher housing growth; 2. speeding up housing construction; 3. stronger measures to achieve SMART growth; 4. acceptance of some increase in in-commuting until adequate housing gets built.”</i></p> <p>The Submission Core Strategy no longer refers to SMART growth. However, it may be the case that any labour supply problem will be avoided through attracting new economically active skilled workers to the District, and therefore there is no longer a requirement to focus on SMART growth.</p>	<ul style="list-style-type: none"> • The Core Policies no longer makes reference to ‘smart’ growth, although smart growth is referred to as a monitoring indicator. The Council should comment on the continued relevance of Smart Growth and state how the objectives of ‘smart growth’ will be achieved through the Core Strategy
13. To improve the development and retention of skills	+	<p>Significant growth in employment and housing opportunities in the District should result in greater retention of skills and an influx of skilled workers.</p>	
14. To ensure that development benefits everyone in the District	?	<p>The large amount of development promoted through this Policy will lead to socio-economic benefits for the District as a whole, but will increase the potential for some existing residents to lose out as a result of nearby development causing disruption.</p>	<ul style="list-style-type: none"> • Careful planning is required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities.

Summary

It is possible to have some discussion of the implications of allocating 14,000 as opposed to 10,000 homes, although it is more valuable to have this discussion in spatial terms, rather than just talking about numbers at the District scale.

The Submission Core Strategy states that, while land for up to 14,000 homes will be allocated, the target is to complete a minimum of 10,100 by the end of 2026, consistent with the emerging Regional Spatial Strategy (RSS). This clear long-term perspective should give developers the certainty that they require when considering whether to invest in the District. Furthermore, this provides flexibility, i.e. a local planning framework in place should house builders be in a position to deliver housing faster, or the RSS requirements be reviewed. Phasing delivery over the long-term, rather than intensive development in the short-term, should also allow an emphasis in early years on infrastructure delivery, identification of affordable housing need and development of skills. Looking beyond the plan period (beyond 2026) should also mean building some of the proposed developments later, thus making them subject to stricter building regulations. Delaying development – particularly on land at Whitfield – could also reduce the air pollution impacts of development, as vehicle technology is set to improve significantly.

In general, that there are benefits to growth in the District, but that benefits are less certain, or less certain to be significantly beneficial, without prior knowledge of where growth will be directed to. Similarly, there are likely to be environmental impacts associated with any increase in development, but these are less certain without prior knowledge of where development will occur.

However, higher levels of development will inevitably result in negative effects in terms of some sustainability objectives. Higher growth will lead to greater resource use (notably water consumption, waste production and greenfield land-take), more pollution, and more impacts on landscape and biodiversity. Greenhouse gas emissions (GHG) associated with buildings will increase overall until level 6 of the Code for Sustainable Homes (and BREEAM equivalent) is reached at which time they may plateau.

However, the Council have developed strong mitigatory measures. In particular, a Green Infrastructure Policy has been developed. It is hoped that this can ensure that the strategic level conservation constraints, opportunities and priorities identified in the draft RSS can be taken forward at the District level. There is also a DM Policy relating to sustainable design and construction, which has been informed by a study examining potential in the District. Furthermore, the Policies relating to the strategic allocations now contain stronger mitigatory measure than was the case at the preferred options stage.

More generally, the Council deserve credit for creating 'key diagrams' showing opportunities and constraints for each of the three settlements that will receive the majority of growth. This is a very transparent approach to planning, which should be helpful to consultees.

The large amount of development promoted through this Policy will lead to socio-economic benefits for the District as a whole, but will increase the potential for some existing residents to lose out as a result of nearby development causing disruption. Careful planning will be required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities..

Recommendations (including mitigation measures)

- It will be important to take account of climate change and sea level rise. As well as predicting the effects of rising sea levels, it will also be important to consider how climate change could lead to the need for land intensive responses, such as managed retreat and the creation of wetland habitat along the coast and river valleys. These responses could be driven by national or regional policy in the future, and should be considered through spatial planning now.

It will be important that such future contingencies are considered for the low lying land to the north of Deal.

- There is more reference made to flood risk in the Submission Core Strategy, than was the case at the preferred options stage, but this remains an important consideration. Development in the floodplain is clearly an important issue, and there should also be efforts made to ensure that there are not cumulative effects of development, through altering drainage and infiltration patterns, which result in increased 'off-site' flood-risk.
- Although there is a Policy dedicated to maintaining the integrity of the Green Infrastructure Network, it is possible that this could also be supplemented by a DM Policy relating to biodiversity, perhaps suggesting ways in which biodiversity should be designed into development.
- The Green Infrastructure Network should be developed and implemented in consultation with key stakeholders. The local Wildlife Trust would seem to be an ideal candidate, as they can seek to put into practice 'living landscape' principles, through proactive engagement with spatial planning. Natural England may also want to be involved, particularly as they can ensure that landscape character and the protection of the Natura 2000 network are integrated into the green infrastructure strategy. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.
- The Core Policies no longer makes reference to 'smart' growth, although smart growth is referred to as a monitoring indicator. The Council should comment on the continued relevance of Smart Growth and state how the objectives of 'smart growth' will be achieved through the Core Strategy.
- There is no over-arching Policy relating to water efficiency in the Submission Core Strategy, although it is recognised that the findings of the evidence base studies relating to water have been integrated into the Sustainable Construction Policy and a requirement for water strategies to be drawn up for two of the four strategic allocations.
- It will be important that the Delivery Plan (which will enact the Delivery Framework) is regularly updated and made available to key stakeholders.
- Careful planning is required to ensure that the existing local residents gain the benefits of regeneration (e.g. through improved and more accessible services and facilities), and that development does not exacerbate existing inequalities.

Policy CP3 – Distribution of housing allocations			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Additional housing at Dover will go some way to improving the housing offer in the town, from the currently low baseline situation. Delivering more affordable housing in Dover will also be welcome, although there are other parts of the District in need of affordable housing, including Sandwich.	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0?	At Dover there is a risk from flooding associated with the river Dour, although it is expected that this flood risk can be avoided. North Deal is at risk from a combination of sea and river flooding (river Stour), although the sea poses a much greater risk.	<ul style="list-style-type: none"> It will be important to take account of climate change and sea level rise. As well as predicting the effects of rising sea levels, it will also be important to consider how climate change could lead to the need for land intensive responses, such as managed retreat and the creation of wetland habitat along the coast and river valleys. These responses could be driven by national or regional policy in the future, and should be considered through spatial planning now. It will be important that such future contingencies are considered for the low lying land to the north of Deal
3. To improve the health and well-being of the population and reduce inequalities in health	++	Focusing development in Dover will be the basis for much needed regeneration, which should in turn lead to improved health. The North Deal area is associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour. It may be that regeneration can contribute to localised health improvements.	

4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	++	<p>Most of the social and economic issues facing the District are concentrated at Dover, which is reflected in the number of its wards with a high incidence of multiple deprivation. Focusing development in Dover will be the basis for much needed regeneration and will be the most effective and efficient way to address deprivation in the District.</p> <p>The North Deal area is associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour.</p>	<ul style="list-style-type: none"> • New housing, particularly in Dover, must act as a catalyst for wider regeneration in the town and not simply gentrification. This can be partly facilitated through careful use of Section 106 monies. Such monies should be channelled from greenfield development into housing renewal in the older parts of Dover.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	<p>Locating housing primarily in Dover will mean that residents can make use of existing services and facilities and there will also be stimulus for the creation of new facilities and employment opportunities (the town centre has a restricted range of facilities and is currently not popular with residents).</p> <p>There is a particular need for improved community facilities in the North and Middle Deal areas which are also areas associated with higher levels of social disadvantage.</p>	
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	?	<p>Locating housing primarily in Dover should mean that the need to travel is reduced, assuming that there is also corresponding growth in employment, retail and leisure in the town. This could lead to improvements in terms of per capita greenhouse gas emissions.</p> <p>However, a constraint to growth at Dover is air pollution. Further development certainly has the potential to worsen the current situation, although there is plenty of scope to mitigate effects.</p>	<ul style="list-style-type: none"> • Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality

7. To conserve and enhance biodiversity	-?	<p>Dover has a rich wildlife and greenspace resource, especially in terms in chalk grassland. Additional greenfield development around Dover has the potential for impacts on internationally, nationally and locally important biodiversity. There is also the potential for increasing the population of Dover more generally to result in indirect effects to important biodiversity, through such things as water resource use, recreational pressure, air pollution along transport routes and water pollution associated with increased pressure at sewage treatment works.</p> <p>To the north of Deal the landscape flattens into wetlands associated with the river Stour and the Sandwich Bay/Pegwell Bay area. The coast and countryside north of Deal is especially important for wildlife and is part of the Natura 2000 network of international sites.</p>	<ul style="list-style-type: none"> It will be important that a full range of indirect effects on the biodiversity resource are considered. This should include a consideration of how habitats come together functionally within a landscape. So, for example, internationally or nationally important habitat may be functionally connected to other non-designated or perhaps locally designated habitat in the wider landscape.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-?	<p>Dover has areas of sensitive surrounding landscape, as well as a valued, and potentially sensitive historic environment. However, Dover's historic environment can also be considered to represent an under-utilised asset.</p> <p>Deal town centre is characterised by small-scale development on a historic street pattern, which only offers limited scope for expansion.</p>	<ul style="list-style-type: none"> It will be important to maintain the integrity of landscape character, and ensure that it is not eroded. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	++	<p>Locating housing primarily in Dover should mean that the need to travel is reduced, assuming that there is also corresponding growth in employment, retail and leisure in the town.</p> <p>Regeneration of Dover may also be a catalyst for increased investment in transport infrastructure and public transport.</p> <p>Furthermore, higher developer contributions would make Dover centre more attractive; and the strategy would also increase the retail offer in Dover, helping</p>	

		<p>to reduce the need to travel out of the District.</p> <p>The Dover District Transport Strategy (2007) found that, assuming normal conditions at the Port, the road network has capacity but experiences problems at some junctions. Any future growth would need to be facilitated by improved walking, cycling and public transport provision and road junction improvements.</p> <p>Rail services are set to improve dramatically when becomes served by the new high-speed services using the Channel Tunnel Rail Link from the end of 2009. This is estimated to reduce the journey time to London by around 30 minutes and bring Dover into a viable commuting time.</p> <p>The road system at Deal is tightly constrained and has limited ability to support growth without significant improvement. Although served by mainline rail services Deal is located away from the principal road network and its highway system is quite constrained. Consequently, it sees a considerable amount of out-commuting to neighbouring employment centres.</p>	
10. To create a high quality built environment	+	<p>In Dover, housing will form part of comprehensive regeneration in some areas, which should result in improvements to the built environment.</p> <p>It has been identified by the Council that the quality of its public realm areas, including the river, requires great improvement in order to provide places of interest which also link the individual parts of the centre and make walking more of an attractive option.</p> <p>The Council have also identified that the town lacks modern buildings of interest or stature which could themselves become symbols of Dover in the future.</p>	

11. To promote sustainable forms of development and sustainable use of natural resources	-	<p>The extra housing at Dover will primarily come forward as part of a major urban extension on greenfield land. However, it is important to realise that the socio-economic need for expansion of Dover is strong, and that spatial options as to how this can occur are limited. The Strategic Housing Land Assessment and other related work shows that there is not sufficient capacity in brownfield land to support the Strategy and that the Whitfield area has best potential for urban extension.</p> <p>At Deal the Housing Land Availability Assessment has shown that there is not a sufficient supply of brownfield land to maintain the current level of population.</p>	
12. To encourage high and stable levels of employment and sustain economic competitiveness	++	<p>Focusing housing in Dover, should mean that it has the potential to support economic growth, as a result of attracting and retaining skilled workers in the District (see 13).</p> <p>North of Deal there are three golf courses ranging up to international standard. There is potential to continue to upgrade the courses and better promote their combined offer to the golfing market.</p>	
13. To improve the development and retention of skills	++	<p>Focusing housing in urban areas, particularly Dover, where choice offered by the housing stock is too narrow and skewed towards terraced housing, will be important for the attracting and retaining more economically active skilled workers in the District.</p>	

<p>14. To ensure that development and benefits everyone in the District</p>	<p>?</p>	<p>These allocations should mean that Dover receives the impetus for regeneration that it requires and that there is also the potential for new housing in other parts of the District to meet market demand and housing need. There is therefore likely to be a net socio-economic benefit across the District as a result of these allocations.</p> <p>However, compared to the corresponding Policy at the Preferred Options stage, this Policy apportions considerably more development to Dover. As a result there is greater potential for there to be severe disbenefits to those existing residents who will suffer disruption as a result of nearby development.</p>	<ul style="list-style-type: none"> • It will be important to ensure that existing residents do not suffer as a result of the major construction activity and more general change that will occur over the plan period. Careful phasing will be important to reduce in-combination impacts.
<p>Summary</p> <p>The increase in housing development and focus of the housing on Whitfield is likely to increase the attractiveness of the Districts housing offer in an area close to where jobs will be created, and so should help to attract and retain economically active and skilled people in the District. However, there are housing needs in other areas of the District other than Dover, which perhaps will remain unmet as a result of this allocation to Whitfield.</p> <p>The increased housing allocated to Dover will make it likely that economic forecasts can be realised through increased inward investment, business start-ups etc. It is likely that revenue raised through development at Whitfield can contribute to bringing about regeneration in the rest of Dover, as well as reversing the trend of decline in service provision therefore addressing the deprivation inequalities that exist in the District. Regeneration in Dover should lead to improvements in the towns built environment and public realm (which will contribute to more sustainable transport patterns).</p> <p>Allowing more people to live and work in Dover, as well as meet a greater range of their needs locally, is likely to be the most sustainable option in terms of reducing the need to travel. The phasing of housing and employment development, as well as the timely delivery of infrastructure will also have important implications in terms of promoting more sustainable transport patterns.</p> <p>Air pollution does, however, remain a constraint to development at Dover. Further development certainly has the potential to worsen the current situation, although there is plenty of scope to mitigate effects. Air pollution can be particularly bad when the port is not functioning properly and traffic tails back through the town. This is an exceptional occurrence rather than the norm, but is an important strategic consideration none the less.</p> <p>The additional housing development promoted by this Policy will come forward on greenfield land at Whitfield. Delivering a large amount of growth at Whitfield, as promoted by the Growth Strategy, has a range of strategic sustainability implications (although it is interesting to note that a considerably lower housing target would also have required this approach¹⁰).</p> <p>The growth allocated to Deal is currently described in the Submission Core Strategy as being of “lower order geared around meeting local rather than strategic needs.” However, it is stated that this is “subject to the outcome of further investigation of the North Deal area.” The Core Strategy Vision states</p>			

¹⁰ At the time of the Preferred Options consultation it was thought that 10,000 homes could be delivered without having to develop to the west of Whitfield. However, this was assuming that windfall sites would be included in this figure. Since this time, the Council has learnt that in fact it would have had to deliver 10,000 homes *in addition* to windfall sites.

that “Deal may have a larger role to play in contributing to the growth strategy if the constraints of the north Deal area can be overcome and the potentials realised.” It is envisioned that any further development at North Deal, if identified by further studies as being appropriate, would be taken forward through an Area Action Plan (AAP).

The North Deal area is associated with issues of higher unemployment, low economic activity, relatively poor educational attainment and perceptions of crime and anti-social behaviour. This part of Deal is poorly served in terms of youth, health and community facilities and as it was associated with the former colliery it has been included into the National Coalfields Programme to aid rejuvenation. However, the northern part of Deal, and the countryside between Deal and Sandwich, is subject to the risk of tidal flooding which is a constraint on development. Also, much of the countryside is environmentally sensitive, with areas of that are internationally important in terms of biodiversity.

A final point to note is that Policy CP1 now allocates 1,000 homes to Aylesham. Previously it was considered to form part of the District's ‘rural area’, but there was a recognition that saved Local Plan policies would be used as the basis by which 1,000 homes should be built in Aylesham (and so land will not be allocated through the Site Allocations document). Correspondingly, the number of dwellings allocated to Aylesham and the rural area has not altered since the preferred options stage.

Recommendations (including mitigation measures)

- New housing, particularly in Dover, must act as a catalyst for wider regeneration in the town and not simply gentrification. This can be partly facilitated through careful use of Section 106 monies. Such monies should be channelled from greenfield development into housing renewal in the older parts of Dover.
- Development must take account of the risk to human health of worsening air pollution, including in existing areas of poor air quality
- It will be important that a full range of indirect effects on the biodiversity resource are considered. This should include a consideration of how habitats come together functionally within a landscape. So, for example, internationally or nationally important habitat may be functionally connected to other non-designated or perhaps locally designated habitat in the wider landscape.
- It will be important to maintain the integrity of landscape character, and ensure that it is not eroded. Ideally, green infrastructure would be planned for in a way that takes into account landscape character and historic landscape character.
- It will be important to ensure that existing residents do not suffer as a result of the major construction activity and more general change that will occur over the plan period. Careful phasing will be important to reduce in-combination impacts.

Policy CP4 – Housing Quality, Mix, Density and Design			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	?	This Policy no longer discusses housing mix, or housing renewal schemes	<ul style="list-style-type: none"> It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	This Policy will have no direct effects in terms of this objective	
3. To improve the health and well-being of the population and reduce inequalities in health	?	This Policy no longer discusses housing mix, or housing renewal schemes	<ul style="list-style-type: none"> It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	?	This Policy no longer discusses housing mix, or housing renewal schemes	<ul style="list-style-type: none"> It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	This Policy promotes relatively high density development, which should be conducive to allowing people to easily access services, facilities and employment locally by sustainable modes of transport.	

6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	+	This Policy promotes relatively high density development, which should be conducive to allowing people to easily access services, facilities and employment locally by sustainable modes of transport.	
7. To conserve and enhance biodiversity	0	This Policy will have no direct effects in terms of this objective	
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	This Policy will have no direct effects in terms of this objective	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	This Policy promotes relatively high density development, which should be conducive to allowing people to easily access services, facilities and employment locally by sustainable modes of transport.	
10. To create a high quality built environment	++	This Policy now sets out how a high quality built environment will be achieved	
11. To promote sustainable forms of development and sustainable use of natural resources	+	This Policy promotes relatively high density development, which should result in relatively efficient use of land.	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	This Policy will have no direct effects in terms of this objective	
13. To improve the development and retention of skills	0	This Policy will have no direct effects in terms of this objective	

14. To ensure that development and benefits everyone in the District	?	This Policy no longer discusses housing renewal schemes.	<ul style="list-style-type: none"> It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities.
Summary As a result of no longer discussing housing mix, or housing renewal schemes, this Policy (as compared to the equivalent at the preferred options stage) does not perform as well in a number of socio-economic objectives. However, the Submission Policy is much more focused on ensuring housing quality and housing at an appropriate density.			
Recommendations (including mitigation measures) <ul style="list-style-type: none"> It will be important that the Council ensures that locational inequalities are lessened and that new communities created are mixed in terms of housing types, therefore creating socially mixed communities. 			

Policy CP5 – Sustainable Construction Standards			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Sustainably constructed homes can also result in financial savings to residents as a result of energy and water savings.	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	Sustainable design and construction techniques can involve designing in features to capture and slow down surface water, which can reduce runoff and therefore reduce flood risk.	
3. To improve the health and well-being of the population and reduce inequalities in health	0	This Policy will have no direct effects in terms of this objective	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	0	This Policy will have no direct effects in terms of this objective	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	0	This Policy will have no direct effects in terms of this objective	
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	+	Domestic energy efficiency can result in significant reductions in CO2 emissions.	
7. To conserve and enhance biodiversity	+	Sustainable design and construction techniques promoted through the Code for Sustainable Homes can involve designing in features that benefit biodiversity.	

8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	This Policy will have no direct effects in terms of this objective	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	0	This Policy will have no direct effects in terms of this objective	
10. To create a high quality built environment	+	Sustainable design and construction represents innovative design.	
11. To promote sustainable forms of development and sustainable use of natural resources	+	It is felt that the requirements of this Policy are relatively ambitious	• See recommendations below.
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	This Policy will have no direct effects in terms of this objective	
13. To improve the development and retention of skills	0	This Policy will have no direct effects in terms of this objective	
14. To ensure that development and benefits everyone in the District	0	This Policy will have no direct effects in terms of this objective	
<p>Summary</p> <ul style="list-style-type: none"> • Government Policy requires all new housing to meet the carbon saving element of the Code for Sustainable Homes (CfSH) Level 3 by 2010, Level 4 by 2013 and Level 6 by 2016. This Policy therefore does not go beyond what will be required anyway through building regulations in terms of carbon saving. However, the Policy does go further by requiring all new housing in the district to actually <i>achieve</i> the CfSH ratings, rather than just meet the minimum standard for the carbon reduction element. This should mean that housing in the District will be required to perform better than is required by building regulations in terms of the other categories of the Code (see Table). <p>Code for Sustainable Homes categories and issues¹¹</p>			

¹¹ For more information on the CfSH see www.communities.gov.uk/thecode [online] accessed 01/08

Categories	Issue
Energy and CO ₂ emissions	Dwelling emission rate (M) Building fabric Internal lighting Drying space Energy labelled white goods External lighting Low or zero carbon (LZC) technologies Cycle storage Home office
Water	Indoor water use (M) External water use
Materials	Environmental impact of materials (M) Responsible sourcing of materials – basic building elements Responsible sourcing of materials – finishing elements
Surface Water Run-off	Management of Surface Water Runoff from developments (M) Flood risk
Waste	Storage of non-recyclable waste and recyclable household waste (M) Construction waste management (M) Composting
Pollution	Global warming potential (GWP) of insulants NO _x emissions
Health and Well-being	Daylighting Sound insulation Private space Lifetime homes (M)
Management	Home user guide Considerate constructors scheme Construction site impacts Security
Ecology	Ecological value of site Ecological enhancement Protection of ecological features Change in ecological value of site Building footprint

• This can be seen to be relatively ambitious (although is not ambitious in terms of carbon saving). In particular, this Policy will result in minimum requirements

in terms of water use that go beyond what will be required by Building Regulations - see Table.

Code for Sustainable Homes mandatory water consumption standards

Code Level	Maximum indoor water consumption in litres per person per day
Level 1 (★)	120
Level 2 (★★)	120
Level 3 (★★★)	105
Level 4 (★★★★)	105
Level 5 (★★★★★)	80
Level 6 (★★★★★★)	80

- What is less ambitious is the requirement for housing to meet CfSH Level 5 by 2016. By 2016 housing will be required to be Level 6 in terms of carbon saving (zero carbon), and so houses will be required to attain the maximum possible carbon saving score (29 points). CfSH Level 6 requires homes to achieve 90 points in total, where as CfSH Level 5 requires homes to achieve 84 points. It can therefore be seen that the Policy is requiring homes to achieve 55 points (84 minus 29) from other categories, when a more ambitious approach would be to require homes to achieve 61 points (90 minus 29) from other categories.
- It is noted that homes that do not meet these standards will be required to achieve commensurate energy and water savings elsewhere in the District. This requirement will require considerable 'fleshing out', presumably in a Supplementary Planning Document, not least because the CfSH is about achieving more than just energy and water savings (although it is accepted that these may be priorities in the District).
- The Council's requirement for non-residential buildings is relatively ambitious, and it is helpful that the Policy makes reference to 'any future national equivalent', as the BREEAM standard is likely to be phased out and replaced by a Code for Sustainable Buildings.

Recommendations (including mitigation measures)

- The Council should consider requiring homes to meet CfSH Level 6 by 2016.
- The Council should comment on the potential for developers to push through planning applications before the adoption of the Core Strategy, in an attempt to avoid having to meet sustainable construction standards.
- The Council should consider whether it would be beneficial to include a presumption that requirements are met on-site, rather than in a commensurate fashion, wherever possible.
- The statement regarding commuted payments from those buildings that do not meet standards on-site requires considerable attention (presumably through an SPD) to ensure that this does not provide a loophole for developers to lessen their spend on sustainable construction.
- The Council should set out their justification for choosing a threshold of 1000m² for non-residential buildings..
- The Council should comment on the potential for this Policy to act as a means to reject planning permission, even in circumstances where the proposal meets building regulations.

Policy CP6 – Infrastructure			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	0	This Policy will have no direct effects in terms of this objective.	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	It is recognised that a new flood defence system between Sandwich and Pegwell Bay is required.	
3. To improve the health and well-being of the population and reduce inequalities in health	+	Health facilities and community infrastructure are promoted as being vital infrastructure in a number of locations.	<ul style="list-style-type: none"> It will be important that the Development Contributions Supplementary Planning Document promotes an integrated, rather than a piecemeal approach to provision of community infrastructure. An integrated approach would consider the multifunctional of community infrastructure, for example, recognising that open space can be important for mental and physical health, community cohesion and biodiversity.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+?	<p>Health facilities and community infrastructure are promoted as being vital infrastructure in a number of locations.</p> <p>However, only a holistic and integrated approach to provision of community infrastructure will guarantee its success in creating and maintaining well integrated and inclusive communities.</p>	<ul style="list-style-type: none"> See above

5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Ensuring that facilities and services are in place prior to development should help to ensure their accessibility.	<ul style="list-style-type: none"> It will be important that community infrastructure becomes more equally distributed amongst the communities of the District. This may mean that new infrastructure is targeted in a way that seeks to re-dress existing inequalities as well as being delivered alongside new development.
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0	This Policy will have no direct effects in terms of this objective	
7. To conserve and enhance biodiversity	+	Major green infrastructure projects are considered through the Core Strategy.	
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	This Policy will have no direct effects in terms of this objective	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Important transport infrastructure projects are listed in the Core Strategy.	
10. To create a high quality built environment	0	This Policy will have no direct effects in terms of this objective	
11. To promote sustainable forms of development and sustainable use of natural resources	0	This Policy will have no direct effects in terms of this objective	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	This Policy will have no direct effects in terms of this objective	
13. To improve the development and retention of skills	0	This Policy will have no direct effects in terms of this objective.	

14. To ensure that development and benefits everyone in the District	+	Provision of community infrastructure through S106 agreements will go some way to ensuring that existing residents do not lose out as a result of increased pressure on local services and facilities caused by new and expanded communities.	
<p>Summary</p> <p>Although the Policy itself has not changed substantially since the preferred Options stage, the Submission Core Strategy now lists a wide range of essential infrastructure projects that must come forward. These infrastructure projects are listed under a range of key headings, demonstrating that community and green infrastructure is being considered alongside (and of equal importance to) traditional infrastructure delivery. There is also now a Delivery Framework, which should lead to infrastructure delivery being planned for in an appropriate way. It is felt that this is a very transparent approach towards planning for infrastructure.</p>			
<p>Recommendations (including mitigation measures)</p> <ul style="list-style-type: none"> • It will be important that community infrastructure becomes more equally distributed amongst the communities of the District. This may mean that new infrastructure is targeted in a way that seeks to re-dress existing inequalities as well as being delivered alongside new development. • It will be important that the Development Contributions Supplementary Planning Document promotes an integrated, rather than a piecemeal approach to provision of community infrastructure. An integrated approach would consider the multifunctional value of community infrastructure, for example, recognising that open space can be important for mental and physical health, community cohesion and biodiversity. • It will be important that measures to alleviate flood risk are considered as an essential infrastructure requirement that must be in place and functional prior to development. This might include hard flood defences. However, it might also mean undertaking a softer approach such as implementing a sustainable drainage system. This type of infrastructure may blur the distinction between a physical and community service, and so it is important that this is not overlooked. • There is a need to be clear about how the Strategic Housing Market Assessment will guide affordable housing delivery. 			

Policy CP7 – Green Infrastructure			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	0	This Policy will have no direct effects in terms of this objective	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	It is likely that good management of the green infrastructure network will also result in good catchment management and good coastal management, reducing flood risk.	<ul style="list-style-type: none"> The green infrastructure network should be designed and implemented in such a way that there are multifunctional benefits.
3. To improve the health and well-being of the population and reduce inequalities in health	+	Good management of the green infrastructure network should ensure that valued natural areas remain accessible, which should encourage outdoor recreation.	<ul style="list-style-type: none"> It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside.
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	?	This Policy does not necessarily promote the close integration of green infrastructure closely with development.	<ul style="list-style-type: none"> It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside.
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	0	This Policy will have no direct effects in terms of this objective.	
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0	This Policy will have no direct effects in terms of this objective.	

7. To conserve and enhance biodiversity	++	The green infrastructure network should help to ensure that a proactive approach is taken to protecting and enhancing the Districts biodiversity resource.	
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	Identifying the valued elements of the District's green infrastructure should help to raise awareness and appreciation of the distinctive elements of the District's countryside.	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	0	This Policy will have no direct effects in terms of this objective	
10. To create a high quality built environment	0	This Policy will have no direct effects in terms of this objective	
11. To promote sustainable forms of development and sustainable use of natural resources	0	This Policy will have no direct effects in terms of this objective	
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	Protecting the District's natural environment will be important in order to make the District an attractive location for investment and business activity.	
13. To improve the development and retention of skills	0	This Policy will have no direct effects in terms of this objective	
14. To ensure that development and benefits everyone in the District	?	Well integrated green infrastructure and protection of the existing resource will be important in terms of ensuring that existing residents benefit from development in the District.	<ul style="list-style-type: none"> It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside.

Summary

The green infrastructure network should help to ensure that a proactive approach is taken to protecting and enhancing the Districts biodiversity resource. Good management of the green infrastructure network should also result in more wide ranging benefits, including:

- Ensuring that valued natural areas remain accessible, which should encourage outdoor recreation
- Good catchment management and good coastal management, reducing flood risk.
- Ensuring that the District's image is suitable for attracting business
- Raising awareness and appreciation of the distinctive elements of the District's countryside
- Ensuring that existing residents benefit from development in the District.

However, it is noted that this Policy does not necessarily promote the close integration of green infrastructure closely with development.

Recommendations (including mitigation measures)

- The green infrastructure network should be designed and implemented in such a way that there are multifunctional benefits.
- It will be important that green infrastructure is accessible and integrated with development, so that there are 'green links' within development and connected to the wider countryside.

Policy CP9 – The Managed Expansion of Whitfield			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	++	<p>This Policy promotes a development of at least 5750 dwellings, considerable more than the 1,800 dwellings promoted by the corresponding Policy at the preferred options stage.</p> <p>This Policy therefore goes significantly further towards widening the choice of housing in Dover. However, because of the need for substantial new transport infrastructure, it is not expected that all of this housing can be delivered in the short-term, and possibly not before 2026.</p> <p>The Policy promotes a targeted housing mix, but only makes a general reference to affordable housing.</p>	<ul style="list-style-type: none"> The Council should expand upon ways in which the development at Whitfield will contribute to meeting the affordable housing need in Dover.
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	+	The site itself is not thought to be at risk from flooding, although an FRA will be undertaken to consider this further.	
3. To improve the health and well-being of the population and reduce inequalities in health	+	<p>It is expected that a mixed and socially inclusive community will develop, closely integrated with open space and local green infrastructure. This should create the opportunities for walking and cycling and other outdoor activities. There is also good access to high quality countryside.</p> <p>The Policy (as compared to the preferred options stage) no longer specifies exactly what forms of community infrastructure should be delivered, although required elements of community infrastructure are listed alongside other infrastructure elsewhere in the Submission Core Strategy.</p>	

4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	Whitfield is not currently associated with any particular problems in terms of deprivation. A mix of dwelling types and sizes should contribute towards the development of a socially inclusive and sustainable community.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+?	<p>Where as the policy at the preferred options stage promoted 'a new local centre for the benefit of the whole settlement', this Policy promotes the development of neighbourhood centres, which it is thought will be on a smaller scale.</p> <p>The Policy does seek to create a well linked settlement, conducive to accessing services, facilities recreational opportunities and employment y means other than the private car.</p> <p>Development of this land raises the need for substantial infrastructure (in particular transport, health and education). The development is of a size where major investment in infrastructure can be funded through the development. Infrastructure will have a long lead-in time, especially in the case of transport, but the Policy does seek to avoid any time-lag problems by requiring a phasing strategy to accompany any proposals.</p> <p>The development will allow for a link between the A2 and A256 north of Whitfield. The A2 currently has a divisive effect on Whitfield and it is hoped that this could have an effect on improving connectivity and cohesion.</p>	<ul style="list-style-type: none"> •The Council should comment on what benefits can be expected as a result of the link between the A2 and A256 north of Whitfield, including benefits for existing residents. •The Council should comment on how 'neighbourhood centres' compare to a 'local centre'
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	+	<p>It is not thought that air pollution will be a significant issue at the site, or as a direct result of the development.</p> <p>It is expected that there will be good opportunities to access services, facilities and employment in Whitfield and Dover Town Centre by walking cycling</p>	<ul style="list-style-type: none"> •The Council should consider taking onboard the recommendation of the Dover District Renewable Energy and Sustainable Construction Study that housing should 'aspire to' CfSH Level 5 with immediate effect. This will be particularly

		<p>and public transport.</p> <p>It is noted that a requirement is for “residential buildings to achieve a minimum of Code for Sustainable Homes level 4 with immediate effect from adoption of the Core Strategy, non- residential buildings to achieve BREEAM excellent standard and schools to achieve zero carbon rating. This is in conformity with the recommendations made by the Dover District Renewable Energy and Sustainable Construction Study.</p>	<p>important as little housing will come forward in Whitfield in the near future, and so it may be that CfSH Level 5 is more achievable by the time that housing does come forward.</p>
7. To conserve and enhance biodiversity	?	<p>This Policy promotes development to the west of Whitfield, where as the corresponding Policy at the preferred options stage did not, although it is important to realise that even under the preferred options policy, it is now recognised that development would have been required to the west as well as to the east of Whitfield.</p> <p>To the west of Whitfield are the Lydden and Temple Ewell Downs, an extensive area of internationally important chalk grassland. These are the northern most of the succession of important chalk downlands that stretch from the coast along the western edge of Dover. The development will not impact directly on the downs, but there will be the potential for more indirect impacts. This has been considered as part of the Appropriate Assessment that has been undertaken on the Core Strategy.</p> <p>Lenacre Wood is a medium sized patch of ancient woodland located to the west of Whitfield. None of the ancient woodland will be lost, but development in close proximity will lead to the potential for significant effects on the ecological functionality of the woodland. In particular, the woodland, and the species populations associated with it, may become more isolated from the surrounding landscape –</p>	<ul style="list-style-type: none"> • Lenacre Wood must be an integral part of a local green infrastructure network, which is aimed at optimising ecological permeability across the area, as well as allowing access by residents of Whitfield.

		therefore affecting long term population viability.	
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-	<p>This Policy promotes development to the west of Whitfield, where as the corresponding Policy at the preferred options stage did not, although it is important to realise that even under the preferred options policy, it is now recognised that development would have been required to the west as well as to the east of Whitfield.</p> <p>Land to the west of Whitfield is less physically contained in the landscape, being a relatively flat expanse of agricultural land open to some long distance views of the coast. It also includes ancient woodland and listed buildings.</p> <p>The vast majority of the site that is being allocated for development is used for arable farming and a number of country lanes cross the site bounded in some places by hedgerows and a network of public rights of way. Church Whitfield Road forms an ancient narrow sunken lane and is the furthest extent of the boundary of the site.</p> <p>The whole of the site is located within the North Downs Special Landscape Area. This is in recognition of the close association that this landscape has with the more valued and sensitive downland landscapes a short distance to the west.</p> <p>The historic hamlet of Church Whitfield is located to the east of the main settlement. It is likely that the Policy will effectively avoid any impact on the historic value associated with Church Whitfield.</p>	<ul style="list-style-type: none"> It will be important to consider whether this landscape contributes to or 'supports' the overall landscape character of the Kent Downs.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	<p>Whitfield is potentially within easy reach of the Town Centre, to which there is currently a regular bus service.</p> <p>This development will result in new neighbourhood centres for Whitfield, therefore creating the potential</p>	<ul style="list-style-type: none"> The Council should comment on what benefits can be expected as a result of the link between the A2 and A256 north of Whitfield, including benefits for existing residents.

		<p>for Whitfield to become more connected, with a greater range of services and facilities easily accessible for all.</p> <p>Furthermore, creating a link between the A2 and A256 north of Whitfield may provide potential for increased connectivity and cohesion. Currently, the main settlement of Whitfield is severed from the rest of the parish by the Whitfield roundabout and the A2 dual carriageway which separates it from the employment development at the White Cliffs Business Park, the District's largest foodstore (Tesco) and Dover Town Centre.</p>	
10. To create a high quality built environment	+	<p>Whitfield currently includes substantial housing estates dating from the second half of the 20th Century. The Policy and supporting text include a number of measures that aim to ensure that development is of a high visual quality.</p>	
11. To promote sustainable forms of development and sustainable use of natural resources	+	<p>It is noted that a requirement is for "residential buildings to achieve a minimum of Code for Sustainable Homes level 4 with immediate effect from adoption of the Core Strategy, non- residential buildings to achieve BREEAM excellent standard and schools to achieve zero carbon rating. This is in conformity with the recommendations made by the Dover District Renewable Energy and Sustainable Construction Study.</p> <p>The majority of the site falls within Groundwater Source Protection Zone 1 and the remainder (a small proportion of land to the west of the Whitfield) is in a Groundwater Source Protection Zone 2.</p>	<ul style="list-style-type: none"> • There must be early commitment to exemplary sustainable design and construction standards and particularly CO2 reduction and water efficiency targets in Whitfield. It is notable that the development will be of a similar size to a number of the proposed Ecotowns, and so the Ecotowns Planning Policy Statement, and the proposals being put together by the development proponents, could be taken into account when planning the expansion of Whitfield. • It will be important that the Council takes on board the findings of the Water Cycle Strategy in terms of how to minimise water use in the built environment and ensure that the vulnerable water resources associated with the area are protected

			from pollution.
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	This residential development will help attract businesses to Dover. Whitfield is accessible to the town centre and White Cliffs Business Park.	
13. To improve the development and retention of skills	+	The development at Whitfield has the potential to be attractive to people with higher level skills.	
14. To ensure that development and benefits everyone in the District	?	It is noted that, where as at the preferred options stage there was a specific and clear reference to ensuring no adverse effect on the amenity of existing residents, this requirement has not been included alongside a requirement to ensure no aesthetic impacts and no impacts on the historic environment. It is questionable whether this might to some degree water down the importance of impacts on amenity and daily life more generally, especially during the construction phase. However, it is noted that there is no a specific reference to ensuring that access arrangements do not impact upon existing residents.	<ul style="list-style-type: none"> •The Council should take the opportunity to expand on measures that will be in place to minimise impacts on the existing community.

Summary

This Policy promotes a development of at least 5750 dwellings, considerable more than the 1,800 dwellings promoted by the corresponding Policy at the preferred options stage. This Policy promotes development to the east and west of Whitfield, where as the corresponding Policy at the preferred options stage promoted development to the east of Whitfield only.

This Policy should contribute significantly towards improving and widening the housing offer in Dover, which will be important in order to attract skilled workers to the District and increase the probability that economic forecasts can be achieved. Development of this land raises the need for substantial infrastructure (in particular transport, health and education). The development is of a size where major investment in infrastructure can be funded through the development. The Policy should ensure that infrastructure delivery remains in balance with housing and other development. Whitfield is potentially within easy reach of the Town Centre, and there is potential to improve connectivity and ease of access to services, facilities and employment.

Strong mitigatory measures have been developed to address potential impacts of the development. In particular, the Council have given serious thought to mitigating potential effects on important areas of nearby countryside (and the historic environment) through the provision of areas of open space that can easily be accessed from the development. Furthermore, a strong Policy has been developed relating to ensuring high standards of sustainable design and construction.

Increasing the quantum of development at Whitfield has the potential to increase negative impacts on the existing local community. The community will be blighted during the construction phase, which could last for a number of years. Furthermore, residents will lose ease of access to the surrounding countryside. However, the Policy does include wording to minimise negative impacts on the existing community and that existing residents benefit in a number of respects.

Recommendations (including mitigation measures)

- The Council should expand upon ways in which the development at Whitfield will contribute to meeting the affordable housing need in Dover.
- The Council should comment on what benefits can be expected as a result of the link between the A2 and A256 north of Whitfield, including benefits for existing residents.
- The Council should comment on how 'neighbourhood centres' compare to a 'local centre'
- The Council should consider taking onboard the recommendation of the Dover District Renewable Energy and Sustainable Construction Study that housing should 'aspire to' CfSH Level 5 with immediate effect. This will be particularly important as little housing will come forward in Whitfield in the near future, and so it may be that CfSH Level 5 is more achievable by the time that housing does come forward.
- Lenacre Wood must be an integral part of a local green infrastructure network, which is aimed at optimising ecological permeability across the area, as well as allowing access by residents of Whitfield.
- It will be important to consider whether this landscape contributes to or 'supports' the overall landscape character of the Kent Downs.
- There must be early commitment to exemplary sustainable design and construction standards and particularly CO2 reduction and water efficiency targets in Whitfield. It is notable that the development will be of a similar size to a number of the proposed Ecotowns, and so the Ecotowns Planning Policy Statement, and the proposals being put together by the development proponents, could be taken into account when planning the expansion of Whitfield.
- It will be important that the Council takes on board the findings of the Water Cycle Strategy in terms of how to minimise water use in the built environment and ensure that the vulnerable water resources associated with the area are protected from pollution.
- The Council should take the opportunity to expand on measures that will be in place to minimise impacts on the existing community.

Policy DM12 – Road Hierarchy and Development			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	0	The Policy will result in no significant effects in terms of this objective.	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	The Policy will result in no significant effects in terms of this objective.	
3. To improve the health and well-being of the population and reduce inequalities in health	+	Traffic congestion can be detrimental to the health of residents and those who commute to work by car.	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	0	The Policy will result in no significant effects in terms of this objective.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Reducing traffic congestion will be particularly important in terms of ensuring good accessibility to services, facilities, recreational opportunities and employment. Reducing traffic will also be important in terms of ensuring an efficient bus network.	
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	+	Traffic congestion is often <i>the</i> major source of dangerous air pollution.	
7. To conserve and enhance biodiversity	0?	Nutrient enrichment as a result of pollution from traffic congestion is often a major problem in terms of maintaining the integrity of some sensitive habitats, including chalk grasslands (which are found in close	

		proximity to Dover). Effects tend to be very localised. It is not clear whether this Policy will have a direct effect.	
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	The Policy will result in no significant effects in terms of this objective.	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Reduced traffic will be important in terms of ensuring an efficient bus network.	
10. To create a high quality built environment	+	Reduced traffic contributes to the quality of the built environment.	
11. To promote sustainable forms of development and sustainable use of natural resources	0	The Policy will result in no significant effects in terms of this objective.	
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	Reduced traffic will contribute to improving the image of the District.	
13. To improve the development and retention of skills	0	The Policy will result in no significant effects in terms of this objective.	
14. To ensure that development and benefits everyone in the District	+	Ensuring traffic does not increase will be a key element of ensuring no adverse effects to existing residents.	

Summary

Seeking to avoid traffic congestion, as is promoted by this Policy, has a range of sustainability benefits, including benefits relating to health, accessibility, air pollution, and the image of the district. Reducing traffic will also be important in terms of ensuring an efficient bus network. This Policy is not detailed and does not specify how the Policy will seek to maximise any specific benefits.

Recommendations (including mitigation measures)

- N/A

Policy DM13 – Parking Provision			
SA Objective	Score	Predicted effect (s)	Recommendations (including mitigation measures)
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	0	The Policy will result in no significant effects in terms of this objective.	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	The Policy will result in no significant effects in terms of this objective.	
3. To improve the health and well-being of the population and reduce inequalities in health	0	Managing parking provision can be an important factor when encouraging people to make use of alternatives to the private car. However, it is not thought that this Policy will result in significant effects in terms of this objective.	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	Parking provision may be important for those living in deprived parts of the District, as there may be no viable alternative to using the private car to access work. It is thought that this Policy should ensure adequate access to parking for all.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Ensuring sufficient parking will be important for those who are less able or inclined to walk and cycle or make use of public transport.	
6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0?	The Policy will result in no direct effects in terms of this objective.	
7. To conserve and enhance biodiversity	0?	The Policy will result in no direct effects in terms of this objective.	

8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	The Policy emphasises a design-led approach to parking provision.	
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	This Policy seeks to closely manage parking provision, including taking into account of the potential for certain locations to make use of more sustainable modes of transport.	
10. To create a high quality built environment	+	The Policy emphasises a design-led approach to parking provision.	
11. To promote sustainable forms of development and sustainable use of natural resources	0	The Policy will result in no significant effects in terms of this objective.	
12. To encourage high and stable levels of employment and sustain economic competitiveness	+	Ensuring adequate parking provision will be important for business.	
13. To improve the development and retention of skills	0	The Policy will result in no significant effects in terms of this objective.	
14. To ensure that development and benefits everyone in the District	+	Ensuring adequate parking provision will be important for those who are reliant on the private car, and are less able to make use of alternative modes of transport.	

Summary

This Policy seeks to carefully manage the amount of parking provision that is suitable for residential development. More parking provision is promoted away from city centres, where people are likely to be more reliant on the private car. Managing provision in this way should have a range of sustainability benefits. The Policy also promotes a design-led approach, which should help to ensure that parking does not hinder wider efforts to improve the quality of the built environment in the District.

Recommendations (including mitigation measures)

- N/A

