

Dover District
Local Development Framework

**Core Strategy Sustainability Appraisal and
Habitats Regulations Assessment Statement**

February 2010

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Chapter 1 Introduction

1.1 Dover District Council adopted its Core Strategy Development Plan Document (DPD) on 24th February 2010. Alongside the preparation of the Core Strategy the Council has carried out a parallel process of appraising and consulting on a Sustainability Appraisal (SA) and the Habitat Regulations Assessment (HRA).

1.2 The SA seeks to identify the economic, social and environmental impacts of the Core Strategy and suggests ways to avoid or minimise negative impacts and maximise positive ones. The HRA was undertaken to assess the potential effects of the proposals included in the Core Strategy on the Natura 2000 network of internationally important wildlife sites.

1.3 When a plan or programme is adopted, the SEA Directive requires the body responsible for preparing it to make information available on how environmental, or in this case sustainability considerations and consultation responses were reflected in the plan or programme and how its implementation will be monitored in the future. It is good practice to extend this statement to include details of how the HRA has been taken into account.

Sustainability Appraisal

1.4 Councils are required to undertake strategic environmental assessment of Plans under the European Parliament Directive 2001/42/EC. This has been incorporated into the process of preparing DPDs under the Environmental Assessment of Plans and Programmes Regulations 2004, and through guidance published by the ODPM (now DCLG) in November 2005.

1.5 Article 9 of the European Directive states that when a Plan is adopted authorities must inform specific environmental consultees and the public with a statement summarising how environmental considerations have been integrated into the Plan, how the environmental report (i.e. Sustainability Appraisal Report) and the result of consultations on the report have been taken into account, and the reason for choosing the plan in the light of other reasonable alternatives. In this context, the specific environmental consultees are Natural England, the Environment Agency and English Heritage.

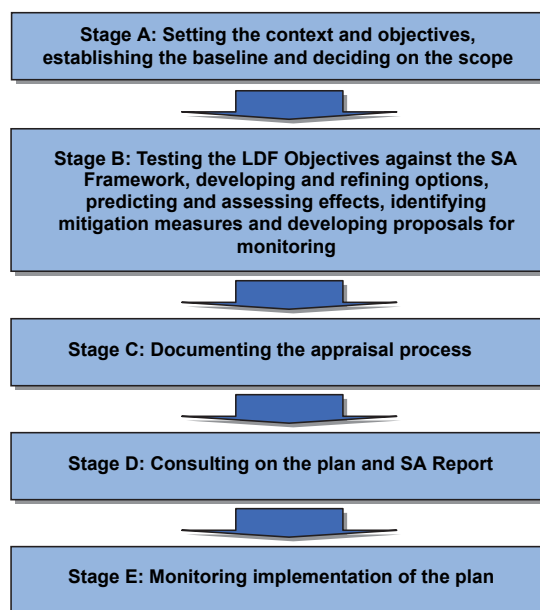


Figure 1.1 The five stage approach to the SA

Habitat Regulations Assessment

1.6 The need for Habitat Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007). The ultimate aim of HRA is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

1.7 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; it simply says that the assessment findings (as documented in the ‘environmental report’) should be ‘taken into account’ during preparation of the plan or programme. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network. In order to ascertain whether or not site integrity will be affected, an HRA should be undertaken of the plan or project in question.

Core Strategy Examination in Public

1.8 The Council’s Sustainability Appraisal Non Technical Summary and Habitat Regulations Assessment was published with the Submission Core Strategy DPD. The Examination Hearing Sessions into the soundness of the Core Strategy DPD were held between 15th and 23rd October 2009.

1.9 The Inspector's Report, issued on 21st January 2010, confirms that the SA shows how sustainability appraisal has influenced the development of the Core Strategy and demonstrates that the policy approaches are the most appropriate when considered against all reasonable alternatives. The Inspector further confirmed that none of the proposed changes, including the Council's Schedule of Minor Changes (dated October 2009), undermine or materially alter the substance of the overall Plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.

1.10 As the Inspector did not recommend any changes which would affect the Sustainability Appraisal Report and the Habitat Regulations Assessment published with the submitted version of the Core Strategy this now becomes the Final Sustainability Appraisal Report. This document has been prepared to address the following points:

- how sustainability considerations have been integrated into the plan;
- Sustainability Appraisal/HRA Consultation;
- how opinions expressed through consultation have been taken in to account;
- reasons for choosing the plan or programme as adopted, in light of other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.



Chapter 2 How the Environmental Considerations have been Integrated into the Core Strategy

2.1 Scott Wilson and Levett-Therivel were appointed by Dover District Council to provide independent advice, appraise and produce the SA and HRA of the Core Strategy. The SA and the HRA were undertaken and supported the Core Strategy throughout its preparation. By undertaking a systematic and iterative process the SA and HRA have been used to:

- develop and refine the Core Strategy;
- assess both the positive and negative effects of the options;
- identify and revise some of the options and consider mitigation measures that address the effects and achieve more sustainable outcomes; and
- select the most sustainable options.

2.2 The SA and the HRA started at the beginning of the Local Development Framework process with a Scoping Report and Context Review which were subject to consultation with the designated Consultation Bodies for the SEA (English Heritage, the Environment Agency and Natural England) for a period of five weeks.

2.3 In order to assess the contribution of the Core Strategy to future sustainable development, a series of 14 sustainability objectives for the District were developed - see Table below.

The sustainability 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
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
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
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
13. To improve the development and retention of skills
14. To ensure that development benefits everyone in the District

2.4 The sustainability objectives provided the benchmark for undertaking the SA. The policies in the Core Strategy were appraised against the objectives as the options - or key choices - alongside the preparation of the Core Strategy. In other words, the objectives provided a methodological yardstick against which to assess the effects of the plan. It was used to predict the potential effects as well as evaluating how significant effects were likely to be.

2.5 The involvement of the designated Consultation Bodies continued throughout the preparation of the Preferred Options Core Strategy, publication and submission of the Core Strategy. Copies of the SA and HRA are available on the District Council's website: www.dover.gov.uk/forward_planning/local_development_framework.aspx which demonstrates how sustainability objectives have been taken into account and integrated into the Core Strategy.

Chapter 3 Sustainability Appraisal/HRA Consultation

3.1 Table 3.1 provides a summary of the various stages that were involved with the preparation and consultation on the SA and HRA as part of the development and refinement of the Core Strategy.

| Date | Plan Making Stage | SA/HRA Document | Details |
|----------------|--------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| April 2004 | | Scott Wilson/Levett Therivel appointed by Dover District Council to undertake the SA/SEA of the LDF | |
| May 2004 | Evidence Gathering | Project Inception meeting with Scott Wilson to identify the actions needed to start the SA process | |
| July 2004 | Evidence Gathering | Stage 1 meeting with Scott Wilson to identify the context and objectives of the SA | |
| September 2004 | Evidence Gathering | SA Scoping Workshop | Workshop to discuss the scope of the SA focusing on: <ul style="list-style-type: none"> • A review of plans and programmes relevant to the LDF; • The sustainable development objectives which will form the basis for the SEA/SA; and • The baseline economic, social and environmental information that will inform the SEA/SA |
| November 2004 | Evidence Gathering | Feedback from the SA Scoping Workshop | Feedback sent to all of those people who attended the SA Scoping Workshop |
| January 2005 | Evidence Gathering | Consultation on draft SA Scoping Report | Consultation with a range of statutory and non statutory organisations, Parish and Town Councils on the Scoping Report following the workshop asking |

| Date | Plan Making Stage | SA/HRA Document | Details |
|---------------|--------------------|--------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | for identification of any gaps in the information and how the information provided on the indicators could be improved |
| March 2005 | Evidence Gathering | Context Review | Established the context in which the LDF was prepared i.e. the other policies, plans, programmes, strategies and initiatives that influenced the content of the LDF (and vice versa) and the opportunities and challenges they presented |
| April 2005 | Evidence Gathering | SA Scoping Report | Documented the findings from the Context Review |
| November 2005 | Evidence Gathering | Dover Strategic Options - Interim SA Report | Documented the appraisal of the objectives and options proposed by the Council and summarises their potential economic, social and environmental implications |
| August 2007 | Evidence Gathering | Scott Wilson appointed to undertake the Habitat Regulations Assessment (HRA) of the Core Strategy and Site Allocations Document | |
| December 2007 | Evidence Gathering | SA Scoping Report Addendum | Documentation of additional information relevant to the LDF and SA process |
| December 2007 | Preferred Options | Briefing note for the Council and Cabinet meeting held to agree the Core Strategy Preferred Options Document for public consultation | Briefing note that identified the Sustainability/HRA implications of the LDF growth options |
| March 2008 | Preferred Options | Core Strategy and Site Allocations Document SA Non Technical Summary and HRA | Identification of the economic, social and environmental impacts of the Core Strategy and Site Allocations Document with suggested ways to avoid or minimise negative impacts and maximise positive ones |

| Date | Plan Making Stage | SA/HRA Document | Details |
|---------------------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| March 2008 | Preferred Options | Core Strategy Sustainability Appraisal Report Volumes 1 and 2 Main Report | Identification of the economic, social and environmental impacts of the Core Strategy and Site Allocations Document with suggested ways to avoid or minimise negative impacts and maximise positive ones |
| July-December 2008 | Preferred Options | | Analysis of comments received on the SA/HRA Documents |
| November 2008 - June 2009 | Pre-publication and post publication of the Core Strategy | | Series of discussions and correspondence with Natural England regarding the HRA and Green Infrastructure |
| January - March 2009 | Publication of the Core Strategy | SA of the Submission Core Strategy and HRA | |
| June 2009 | Submission of the Core Strategy | Paper issued on the Natura 2000 sites and the HRA of the Core Strategy | Following concerns voiced by Natural England, Kent Wildlife Trust and the RSPB in respect of perceived impacts on the Natura 2000 sites, this note was prepared to consider the various sites in finer detail |
| October 2009 | Submission of the Core Strategy | Meeting with Dover District Council, Scott Wilson, Natural England, Kent Wildlife Trust and RSPB | This meeting was held to try and agree some revised wording for the Core Strategy prior to the Examination in Public |
| October 2009 | Core Strategy Examination | | Inspector's Report received in January 2010 which confirms that the Core Strategy is sound and none of the proposed changes will materially alter the substance of the overall plan and its policies, or undermine the Sustainability Appraisal and the participatory process |
| February 2010 | Adoption | SA/HRA Adoption Statement | |

Table 3.1 Stages Undertaken in the Production of the Sustainability Appraisal/Habitat Regulations Assessment



Chapter 4 How the Opinions Expressed through Public Consultation have been taken into Account

4.1 At each stage of the preparation of the Core Strategy all consultees, those submitting representations and the public, have been made aware of the publication of new documents. Hard copies of documents have been made available at the Council Offices, Area Offices and at local libraries. All documents have been placed on the Council's website. The main SA/HRA Reports are summarised as follows:

- SA Scoping Workshop (April 2005) – identification of the key messages that should be taken into account in developing the Dover LDF
- Context Review (March 2005) - review of international, European, regional, sub-regional and local policies, plans and programmes
- Dover Strategic Options Interim SA Report (November 2005) – sets out the broad baseline for the District based on a series of indicators and GIS maps and appraisal of growth options
- Sustainability Appraisal (29 respondents) and Habitat Regulations Assessment of the Core Strategy and Site Allocations Document (23 respondents) (March 2008)
- Sustainability Appraisal (2 respondents) and Habitat Regulations Assessment of the Core Strategy (1 respondent) (January 2009)
- Paper on Natura 2000 Sites and Habitat Regulations Assessment (June 2009)

4.2 Under the SEA Directive, the findings from the SA and the responses received to the consultation on the plan or programme must be taken into account by decision-makers before the adoption of the plan or programme. Representations made during the consultation on the SA and HRA at Preferred Options stage of the Core Strategy were recorded, analysed and where appropriate were used to help inform and refine the Core Strategy's policies and proposals. All of the representations received and the responses to the individual points that were made to the SA/HRA during the consultation period were made publicly available.

4.3 Following the consultation on the Preferred Options Core Strategy the District Council re-drafted the Core Strategy and Scott Wilson revised the SA and HRA which included an appraisal of the changes to the Core Strategy.

4.4 Concerns were voiced by Natural England, Kent Wildlife Trust and the RSPB at the Preferred Options stage in respect to the perceived impacts on Natura 2000 sites within the Dover District Council boundary. The Paper on Natura 2000 sites was prepared to assess the Natura 2000 sites in finer detail against the impact pathways that were identified in the HRA.



Chapter 5 The Reasons for Choosing the Plan or Programme as Adopted, in light of the other reasonable alternatives dealt with

Sustainability Appraisal

5.1 The Core Strategy objectives and growth options were originally appraised in 2005. The various growth options that were appraised involved planning for the following number of homes to 2026:

- Option 1 'Low Growth' - 6,100 new homes
- Option 2 'Medium low growth' - 8,100 new homes
- Option 3 'Medium high growth' - 10,000 new homes
- Option 4 'High growth' - 14,000 new homes

5.2 Table 5.1 below compares the sustainability implications of Options 1-4. Scott Wilson concluded that Options 1 and 2 would have the least environmental impacts but the least economic and social benefits. Options 3 and 4 would have the greater economic and social benefits and greater environmental impacts.

5.3 The SA identified that Option 4 was broadly the best option in terms of economic and some social factors (notably employment and the provision of affordable housing). Option 3 is likely to be more deliverable within the plan period (to 2026) and would cause the least environmental harm.

5.4 Options 1 and 2 would be unlikely to trigger the level of activity necessary to invigorate and regenerate the District. 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 economy and healthcare).

5.5 Uncertainties were identified and associated with Option 4, particularly after 2016 as it is difficult to forecast the number and types of jobs that will come to the district after 2016. Because Option 4 assumes a high growth in jobs, if this does not occur in practice, building 14,000 homes could lead to an over-provision of homes, and possibly outcommuting.

5.6 On the other hand, all the options assume that jobs will be 'SMART' that they will be based on a workforce that is more efficient than at present. If this increased efficiency does not occur, then more jobs would be needed to achieve the predicted level of economic growth. This would lead to a need for even more than 14,000 new homes. Not achieving economic growth targets would have similar housing implications to not achieving 'SMART' growth.

5.7 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 – i.e. Option 4 – and the risks that this entails. Option 3 was identified as having fewer risks in this sense, although in the long term it does not grapple with the potential mismatch between employment and housing in the way that Option 4 does. Taking all of these factors into account, Option 3 was identified in the SA as probably the best option to 2026, although it should be viewed as upwardly flexible.

5.8 The Submission Core Strategy has allocated land for 14,000 homes with the aim to provide at least 10,000 homes by 2026. This will provide developers with the certainty that they require when considering whether to invest in the District. Furthermore, this provides flexibility i.e. local planning framework in place should housebuilders be in a position to deliver housing faster, or the RSS requirements are reviewed. Phasing development over the long-term, rather than intensive development in the short term, should allow an emphasis in early years on infrastructure delivery, identification of affordable housing need and the development of skills.

| Sustainability appraisal objectives | Option 1 – ‘Low growth’, 6,100 units | Option 2 – ‘Medium low growth’, 8,100 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) | 0? | 0? | -? | -? |

| Sustainability appraisal objectives | Option 1 – ‘Low growth’, 6,100 units | Option 2 – ‘Medium low growth’, 8,100 units | Option 3 – ‘Medium-high growth’, 10,000 units | Option 4 – ‘High growth’, 14,000 units |
|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------------------------------------|--------------------------------------------------|-------------------------------------------|
| emissions) and ensure air quality continues to 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 | + | ++ |

Table 5.1 Sustainability Appraisal of the options

| Symbol | The option is likely to have... | Symbol | The option is likely to have... |
|--------|---------------------------------|--------|---------------------------------|
|--------|---------------------------------|--------|---------------------------------|

| | | | |
|-----------|---------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------|
| ++ | A very positive impact on the objective | ? | an uncertain impact on the objective / there is insufficient information to determine an impact |
| + | A positive impact on the objective | - | a negative impact on the objective |
| 0 | no significant effect on the objective / no clear link with the objective | -- | a very negative impact on the objective |

Habitat Regulations Assessment

5.9 The Core Strategy as a whole was evaluated in detail within the context of existing knowledge of the various ways in which development could impact on European sites, accumulated from Scott Wilson carrying out HRAs across the country at all geographical scales (from individual projects through to Regional Spatial Strategies).

5.10 The screening process for the plan was completed during earlier stages of the HRA for the Core Strategy. In summary, Scott Wilson concluded that the Core Strategy could not be screened out as being inherently unlikely to lead to adverse effects on European sites and therefore required Appropriate Assessment. Individual policies were re-screened during the Appropriate Assessment in order to determine whether they had the potential to lead to adverse effects.

Sites scoped into the assessment

5.11 Five European sites lie wholly or partly within the Dover boundary which needed to be considered and assessed in the HRA in terms of the potential impact that the Core Strategy's policies and allocations would have on them:

- Dover to Kingsdown Cliffs SAC
- Lydden & Temple Ewell Downs SAC
- Sandwich Bay SAC
- Thanet Coast and Sandwich Bay SPA
- Thanet Coast and Sandwich Bay Ramsar

5.12 A further six European sites are considered to have links with development within Dover District's boundary via pathways as described above and as such were also included in the HRA. These are:

- Blean Complex SAC
- Folkestone to Etchinghill Escarpment SAC
- Thanet Coast SAC
- Stodmarsh SAC
- Stodmarsh SPA
- Stodmarsh Ramsar site.

5.13 All the policies in the Core Strategy were scoped for potential conflicts with European sites. The majority of policies could be 'scoped out' as there is no opportunity for any of these policies to result in adverse effects on European sites.

5.14 The overall conclusion of the HRA was that the Submission Core Strategy, and in particular the associated supporting work (such as the Water Cycle Study, Dover Transport Strategy and green infrastructure planning), does remove the need for a number of the mitigation and avoidance measures that were recommended as part of the February 2008 iteration of the HRA. However, the substantial increase in the scale of housing at Whitfield, and the incorporation of land to the west of the settlement does increase the scale of alternative natural greenspace that will need to be provided in conjunction with the development and the need for access management of the Lydden to Temple Ewell Downs SAC. With regard to other settlements and European sites, it was considered that some further measures are still required to provide greater assurance that adverse effects will not result. Further details on these mitigation measures are included in Chapter 6.



Chapter 6 The Measures that are to be taken to Monitor the Significant Environmental Effects of the Implementation of the Plan or Programme

6.1 Article 10 of the European Directive sets out the requirement to monitor the significant environmental effects of the implementation of plans, to identify unforeseen adverse effects and to take remedial action. It acknowledges that existing monitoring arrangements may be used, if appropriate, with a view to avoid duplication of monitoring.

6.2 Chapter 5 of the Core Strategy includes a monitoring framework. The monitoring framework has been prepared to understand whether the strategy and policies of the Core Strategy and subsequent DPDs are delivering the intended outcomes. The monitoring framework in the Submission Core Strategy, therefore, comprises of a 'bundle' of indicators which monitor the significant environmental, social, and economic effects of the Core Strategy. The intention is to monitor whether an objective is delivering the intended outcome or trend towards sustainable development and the achievement of the sustainability objectives (see paragraph 6.10 and Table 6.1).

6.3 Higher levels of development in the District will inevitably result in negative effect 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 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 but this is dependent on advances in technology. However, the Council have developed strong mitigation 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 (Policy CP5 and Policy CP6). A Green Infrastructure network has been developed which will form the basis of a Green Infrastructure Framework (Policy CP7).

6.4 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 funds becoming available through developer contributions, the allocation of which will be determined by a forthcoming Supplementary Planning Document (SPD). The Submission Core Strategy identifies 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. The Core Strategy in Chapter 5 includes a Delivery Framework which should lead to infrastructure delivery being planned for in an appropriate way. The Delivery Framework will be supported by a detailed Delivery Plan.

6.5 The large amount of development promoted through the LDF will lead to socio-economic benefits for the District as a whole, but it could 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.

Impact on European sites

6.6 The HRA recommended that recreational impact on European sites is avoided by provision of alternative green space to draw visitors away from them which would be accompanied by increased visitor management on the European sites. The Core Strategy does not translate this recommendation into detailed proposals but proposes that it is implemented through the Green Infrastructure Framework.

6.7 The Inspector's Report on the Core Strategy indicated that work on green infrastructure should be progressed in parallel with the work on the Site Allocations Document which was considered to be an acceptable way forward rather than including a detailed mitigation strategy in the Core Strategy. In order to progress with work on green infrastructure further research and evidence is needed in order to establish the nature and use of the European sites in and around Dover. As there are cross boundary issues the work on green infrastructure is being undertaken in partnership with the neighbouring East Kent local authorities; Canterbury City Council, Thanet and Shepway District Councils.

6.8 In the HRA of the Core Strategy the impact of nitrogen emissions from vehicles associated with large-scale new housing developments on the *Festuca-Brometalia* of the Lydden and Temple Ewell and Folkestone to Etchinghill Escarpment SACs were identified as having potentially significant effect (Regulation 48 (1)(a) of The Conservation (Natural Habitats, &c.) Regulations 1994). In order to test the above hypothesis further, it was necessary to understand the interaction between vehicular-borne nitrogen emissions and its impact on chalk grassland. The inter-relationship between vehicle nitrogen emissions and chalk grassland depends on a number of interacting factors:

- The plant community, its condition and resilience
- The distance between source and the target grassland
- Whether maintenance, or improvement of the grassland is sought.

6.9 In the case of Dover further work has been undertaken to understand the impact of Nitrogen Dioxide on the Lydden and Temple Down European SAC. This work concluded that more detailed modelling would be a useful first step along with testing the impact of local wind conditions. Once this baseline information is established the number of vehicles travelling along the A2 and the future emissions could then be tested against a baseline of 2010.

Monitoring

6.10 The following table sets out the strategic indicators that will be used to help assess progress on the implementation of the Strategy. They are based upon the Strategy's objectives and will be used by the Implementation Group as well as forming a basis for the Council's Annual Monitoring Report.

6.11 While most of the objectives can be measured quantitatively, some do not lend themselves to this and progress will be measured in a different way.

| Objective | Measurement | Base Figure | 2011 Target | 2016 Target | 2026 Target |
|-----------------------------------------------------------------|------------------------------------------------------------|--------------------------------|---------------------------|----------------------------------------|--------------------------------|
| 1 - population and labour supply growth | Total Population | 104,800 (2007) | | | 111,500 |
| | Working age population | 73,800 (2001) | | | 72,100 |
| 2 - Transformation of Dover town | Retention of shopping spend | 45% | | | 55% |
| | Total housing stock | 49,400 (HSSA 2008) | | | 59,500 |
| 3 - Improved housing range and choice | RSL Stock | 2,320 | | | 5,350 |
| | Rank in Kent by new Residential build rates | 12th | | | 7th |
| 4 - Progress with Middle/North Deal investigation | Completion of investigation | | Complete | AAP adopted and implementation started | |
| | Preparation of Area Action Plan | | If justified commence AAP | | |
| 5 - Local economy performance | Increase in jobs | 47,700 (2006) | | | 54,200 |
| | Increase in economic activity rate | 77% | | 82% | |
| | Increase the business stock | 35 businesses per 1,000 pop | | 50 businesses per 1,000 pop | |
| 6 - Social disadvantage | Have no areas within 20% of most deprived in England | 4 areas in 20% most deprived | | | 0 areas in 20% most deprived |
| | Percentage of working age residents with no qualifications | 50% over the regional average | | | 25% over the regional average |
| 7 - Improve residents' skills levels towards the County average | Percentage of working age residents with NVQ level 4 | 50% less than regional average | | | 25% less than regional average |

| Objective | Measurement | Base Figure | 2011 Target | 2016 Target | 2026 Target |
|---------------------------------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------|----------------------|-------------|--------------------------------------------|
| 8 - Improve ease of travel and encourage walking, cycling and use of public transport | HS1 train service in operation | No service | Service in operation | | |
| | Western Docks T2 in operation | Preparatory Stage | | Operational | |
| | Increase sustainable commuting | Rail - 2%, Bus - 4%, Cycle - 3%, Foot - 12% (2001) | | | 2% increase in all modes |
| 9 - Improve green infrastructure network | Improve condition | As shown on Figure 2.5 | | | Implement proposals as shown on Figure 3.6 |
| | Expand network | | | | |
| 10 - Make better use of historic assets | Number of visitors to Dover Castle | 280,000 | | | |
| 11 - More efficient use of natural resources | Average domestic water consumption | 160 litres per person per day | | | 120 litres per person per day |
| | Average domestic electricity consumption | 4,164 kWh per person | | | |
| | Average domestic gas consumption | 16,615 kWh per person | | | |
| 12 - Infrastructure provision | Provision of infrastructure identified in Table 3.3 | | | | All identified infrastructure delivered |

Table 6.1 Strategic Indicators

Chapter 7 Further Information

7.1 Copies of the Adopted Core Strategy, the various iterations of the SA and HRA and all of the related documents can be downloaded from the District Council's website:

www.dover.gov.uk/forward_planning/local_development_framework.aspx

For further information on the Local Development Framework please contact:

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Appendix 1 Analysis of Representations Received on the SA

| Respondent | Comment | Response |
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| Mr Richard Moyses (Kent Wildlife Trust) | <p>The approach to sustainable development set out in PPS12 and PPS1 are summarised, before stating that: "The word 'and' in the penultimate clause is critically important here, since it underlines the importance in delivering social, economic and environmental benefits, and signals a move away from the kind of trade-offs, which were previously the norm, between maximising economic gain while minimising environmental harm. Clearly, this approach, which we would support, has not been taken in drawing up and applying the results of the sustainability appraisal of the Core Strategy. The appraisal of each of the four potential growth options shows that economic benefits increase as you move from option 1 towards option 4, but the environmental harm also increases. Patently, none of the options meet the requirements for sustainable development, and the statement, in paragraph 7.6 of the Sustainability Appraisal, that 'Option 3 is likely to be more deliverable during the plan period, and cause less environmental harm' shows that real point of the appraisal exercise has been missed entirely. If it is to be undertaken in accordance with government planning policy, the use of sustainability appraisal to select one of a series of options, as has been attempted here, must involve selecting the option which delivers the greatest gains across the full list of sustainability appraisal objectives. If any one option shows clear negatives, and particularly, as in the case of the Dover Core Strategy, where these negatives are clustered around a particular issue (in this case, environmental impacts), it clearly indicates that either the option is inappropriate or that other Core Strategy is significantly inadequate. That the latter, at least, is the case, is emphasised by paragraph 7.33 of non-technical summary of the sustainability appraisal, which states that policies DM18-DM23 'are likely to go some way to ensuring</p> | <p>Each of the potential growth options would necessitate trade-offs to be made, and for each one the SA has identified where the potential trade-offs lie. Identification of trade-offs increases the transparency of decision-making. This is a key aim of SA. Decisions may also be informed by the SA, but should not be directed by the SA. It is accepted that the SA may have failed to identify comprehensive mitigation measures. However, the SA will also have increased the possibility of mitigation measures being successfully identified through the consultation process, as a result of setting out the likely significant effects. It is agreed that the Pre-submission version of the Core Strategy and supporting SA should look afresh at mitigatory measures, and not be limited by what was suggested in within the previous SA. The statement that there may be unavoidable residual effects as a result of the District's growth strategy is noted. The SA Report will clearly highlight the nature of any significant residual effects.</p> |

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| Whitfield Action Group | <p>effective protection of the natural environment'; i.e. at best, the existing policies actually fail to fully secure this protection. The sustainability appraisal fails to make clear recommendations for policy modifications which will address the important environmental impacts of the preferred option. Nonetheless, it may be possible to identify new Core Strategy policies, or modifications to existing environmental policies, which would lead to the negative environmental impacts associated with options 2, 3 and 4 being reversed; the District Council should investigate how such policies, which should be drawn up in accordance with provisions of PPS9 and Policy NRM4 of the South East Plan, might be drawn up. However, given the location of the major development sites which have been selected to deliver preferred options, it may be that modifications to environmental policies will not, alone, be sufficient to ensure conformity of the Core Strategy with government planning policy; this would then require a review of the growth options, which should be undertaken, as set out in PPS1, in an integrated way which protects and enhances the environment. There is therefore a need for the sustainability appraisal to be significantly revised in order to identify, clearly and in a way which would permit their implications to be understood, such policy modifications or new policies which would be required in order to develop options which meet the stated government aims for sustainable development; Identify where remaining negative impacts occur; and, if such impacts remain, to review the growth options themselves in order to ensure that the submission stage Core Strategy cannot be considered unsound.</p> | |
| | <p>This document does not assess the sustainability of the Council plans by any common definition of sustainability. A sustainability appraisal should demonstrate beyond a reasonable doubt that the plans will maintain or improve Dover District prospects and success over a long</p> | <p>The 'definition of sustainability' that would be applied through the SA of the Core Strategy is set out in the SA Framework, which itself was generated following a robust consideration of</p> |

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| | <p>period, without undue risk of failure. It should take all factors into account and examine the plans and evidence for soundness. This document does not. It simply repeats all that is in the Core Strategy, lists the issues and problems, lists the objectives, but fails to properly appraise or assess the sustainability of the Core Strategy and Site Allocations documents. It may be a non technical summary, but it is devoid of any analysis of evidence except for table 6 which is a highly subjective and simple series of boxes with + and – symbols in. The conclusions do not highlight the lack of information on where the demand for a step change in housing numbers will come from, or the lack of information on where the new population is expected to come from. Neither does it highlight the lack of information on predicted new job creation nor the lack of information on the type or value of these jobs. It does not question the lack of commitment and funding for infrastructure and community services nor does it assess the effects of moving the population and economic base out of the Town of Dover.</p> | <p>evidence at the scoping stage of SA (which included a period of formal consultation). The evidence base that has fed into the development of the SA framework, and has been used to evaluate the significance of sustainability effects, is summarised in the SA Report and NTS, but only set out in detail only in the Scoping Report. The SEA/SA seeks to identify sustainability effects in terms of a range of sustainability objectives. Each of the potential growth options would necessitate trade-offs to be made, and for each one the SA has identified where the potential trade-offs lie. It is not role of the SA to identify how best to “maintain or improve Dover District prospects and success over a long period, without undue risk of failure”. How best to do this is a political decision, which should be made in the political arena, having regard for the trade-offs identified through SA and public consultation. In appraising the Pre-Submission version of the Core Strategy the SA will ensure to explore the assumptions surrounding the growth options (e.g. the demand for housing) where these are likely to have sustainability implications that are best addressed at the strategic level of decision-making.</p> |

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| Mr Keith Gowland | <p>The Sustainability Appraisal is hard hitting but accurate and must be taken seriously if the area is to become a world-class district.</p> <p>Pg 24: I would have expected Option 3 to have a significant impact on development and retention of skills.</p> <p>Pg 25: (7.4) Labour supply and job creation must be managed to circumvent post 2016 imbalance.</p> <p>Pg. 25: (7.4 and 7.5) The difference between Option 3 and Option 4 should be held in reserve to be implemented as and when, probably post 2030 as there is not enough time before 2026.</p> | <p>It is noted that the impact of Option 3 on development and retention of skills (both in absolute terms and relative to the other options) should be reconsidered. It is noted that there is the need to manage job creation and labour supply to circumvent a post 2016 imbalance. The SA of the Pre-Submission Core Strategy will take account of the point made regarding deliverability.</p> |
| Sellwood Planning on behalf of Crest Strategic Projects Ltd. | <p>CSP welcome the publication of the SA but consider that</p> <ol style="list-style-type: none"> 1. (para. 3.5) The references to the RSS Panel's recommendation should be caveated by a note stating that the Government's response to the recommendations is awaited. 2. (6.1) It is felt that the fourteen sustainability objectives do not fully articulate the Core Strategy vision. It is suggested that an additional objective is added which seeks to reduce the economic and social disparities between Dover and the rest of Kent 3. (7.6) CSP support the identification of Option 4 as most fully delivering the Core Strategy Vision but consider the reasons for choosing Option 3 are short sighted and unsound 4. (7.7) The recital of the impact of Option 4 on the Lydden Downs SAC air quality fails to refer to the reductions in air quality which could result from diverting traffic on to a new A2 / A256 link | <ol style="list-style-type: none"> 1. The SA of the Pre-Submission Core Strategy will summarise the latest policy context that must be taken account of. 2. The sustainability objectives were developed following a rigorous scoping process. Significant changes to the SA framework could only be made following further evidence gathering and (probably) consultation. 3. In Paragraph 7.6 (and elsewhere) the risks associated with Option 4 are described. The SA has been sure to consider the short and long-term nature of potential sustainability benefits and risks. |

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| | <p>5. (7.8) The assumption of nil job growth between 2016 and 2026 is unsound. The Roger Tym and Partners Report (attached to CSP's Core Strategy representations) provides evidence that job growth 2006 – 2026 is likely to be in the 5000 – 7120 range. This higher level of job growth is a further indication that Option 4 is the correct and robust strategy</p> <p>6. (7.9) Option 3 would not put in place a long term infrastructure strategy for Dover and it would be difficult to subsequently move to Option 4</p> <p>7. (7.10) It would not be sound to extend the plan period to 2031. It would be more appropriate to select Option 4 to 2026 with the acceptance that some elements of the strategy may not be completed until after 2026.</p> | <p>4. Paragraph 7.7 refers to the potential for effects only. It will be the job of the Appropriate Assessment to give detailed consideration to the likelihood of significant effects.5. Paragraph 7.8 does not make the assumption of nil jobs growth post 2016, but rather identifies that there is greater uncertainty. However, it is noted that CSP has submitted a report prepared by Roger Tym and Partners (RTP) which rolls the economic forecasts for the District forward to 2026. This suggests that the number of jobs will grow by between 5,000 and 7,120 between 2006 and 2026. It is also noted that this level of job growth, should it occur, would be unsustainable without a commensurate increase in the local working population.</p> <p>6. It is accepted that Option 3 might fail to give certainty to developers, infrastructure providers and local people. In particular, it would fail to put in place a comprehensive infrastructure strategy which could deliver Option 4. This is an important point that will be taken account of within the SA of the Pre-Submission Core Strategy</p> <p>7. This representation should be made regarding the Core Strategy, rather than the findings of the SA. However, it is noted that there may be benefits to adopting Option 4 but accepting that it may not be fully implemented by 2026, since the infrastructure for Option 4 will have been set</p> |

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| Shepherdswell Parish Council | <p>The Parish Council consider that significant additional development of Shepherdswell would involve extra traffic using already overcrowded, inadequate roads. Although Shepherdswell has a railway station, it effectively only serves the lower half of the village due to the topography of the area. It is thought that the station will be down-graded because it is not included in high-speed improvement proposals. The Parish Council point out that bus services to the village are very poor due to narrow village roads and for practical purposes serve the top half of the village only.</p> | <p>Representations relating to the detail set out in the settlement hierarchy are not relevant to the SA.</p> |
| | <p>I believe the LDF Report prepared by Scott Wilson is fatally flawed as most of the Dover District's Core Strategy objectives would not be met.</p> <p>1) The Council cannot predict who will purchase the proposed new homes. The purchasers could be:</p> <ul style="list-style-type: none"> • Predominantly retired from other areas, which would have a negative effect on the "sustainability" of the plan by adding to Council costs for the elderly, failing to lower the age mix of the area, and taking up accommodation specifically built to enlarge the local workforce. • Out-commuters, attracted by lower prices, using the Channel Tunnel Rail Link. • Out-commuters using the car to drive to Maidstone, Ashford and Canterbury.2) I wholeheartedly disagree with the statement of "The Appraisal Report", which says: - "To ensure that development benefits everyone in the District". What contribution could positively negate the | <p>The SA of the Pre-Submission Core Strategy will take account of the potential for assumptions made in support of the Growth Options, and the risks associated with those assumptions. The potential for impacts to existing residents in Whitfield as a result of any proposed development is certainly an issue of strategic importance, and so will be highlighted clearly through the SA of the Pre-Submission Core Strategy as part of the appraisal against the SA objective - "To ensure that development benefits everyone in the District".</p> |

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| | harm caused by pollution issues of loss of tranquility, and increase in noise, light, traffic and air pollution? I am absolutely incensed by the lack of protection afforded to existing residents by the Local Development Framework. | |
| Jane Griffin (SEEDA) | Pg. 17: Table 3 identifies that tourism potential of the District is not being achieved. Consider that it would make sense to include the following from the IRF: 'Encourage the development of a buoyant, sustainable tourism sector'. 'Improve the economic competitiveness of the borough and facilitate economic growth'. Other issues presented in the IRF might also be better: 'Deliver high and stable levels of employment so that everyone can benefit from economic growth'. 'Develop and maintain a skilled workforce to support long term competitiveness of the borough and the wider region'. | As tourism is identified as a key issue, the implication is that this will have been taken account of as a key piece of evidence during the assessment against the SA objectives. It is not possible to change the SA objectives without undergoing a further process of scoping. However, the need to encourage the development of a buoyant, sustainable tourism sector' will be considered as part of the SA of the Pre-Submission Core Strategy, as will the other objectives mentioned. These will be considered as either key issues or sub-objectives within the SA framework. |
| Mr John Devine (The East Kent Gospel Hall Trust) | 'and well-being of the population' in the SA objectives demonstrates that there is something beyond physical health. It is now widely accepted that the spiritual and mental condition persons is of concern to health authorities. This objective needs clarification of 'well-being'. | The SA of the Pre-Submission Core Strategy will consider clarification of 'well-being' through the incorporation of a sub-objective under the SA objective 3. |
| Mr Simon Reynolds (Strutt and Parker) | We agree with the objectives the Council has set in the Sustainability Appraisal in regard to retaining the character and distinctiveness of the historic and visual environment; maintaining and enhancing landscape character; creating a high quality built environment an promoting locally distinctive design; promoting sustainable forms of development and; using land efficiently. | Support noted. |

| Respondent | Comment | Response |
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| Ms Sally Fletcher(Januarays) | Given that Option C Whitfield expansion is located within easy walking/cycling distance of the White Cliffs Business area, it is hard to understand why this allocation should be considered not to facilitate an alternative means of transport to the car. This needs to be re-investigated. | The proximity to White Cliffs business park was considered as part of the assessment against this SA objective. However, the representation made – that this proximity will have strategic benefits in terms of facilitating alternative means of transport to the car – is noted and this issue will be reinvestigated as part of the SA of the Pre-Submission Core Strategy. |
| Sellwood Planning on behalf of Crest Strategic Projects Ltd. | The references to the impact of Option 4 (and the proposed A2 / A256 link) on the Lydden and Temple Ewell Downs SAC do not provide a balanced assessment of the positive and negative impacts on the SAC. Option 3 would provide 1800 dwellings east of Whitfield but the additional traffic generated would continue to use the existing A2 adjacent to the SAC, hence the air quality situation is likely to worsen. With Option 4, the A2 would be diverted away from the SAC, thus reducing air pollution. | This is potentially an important point that will be considered as part of the Appropriate Assessment. |
| Mrs Pauline Simpson | This is not a useful statement."Strong measures to minimise water use" doesn't mean anything and should be spelled out in detail so that it is clear what measures will be required to provide water to the expanded community. This is an extremely important issue and should not have been dealt with so flippantly. | It is thought that, rather than being flippant, the finding of the SA recognises the importance of the issue. |
| Mr Tim Clark(Deal Congregation of Jehovah's Witness) | Could you include places of worship in your examples of community infrastructure. | It is agreed that places of worship are of strategic importance. The SA of the Pre-Submission Core Strategy will consider mentioning places of worship as one type of community infrastructure. |
| Mr John Devine (The East Kent Gospel Hall Trust) | (Comments relate to CP6 on page 44 of the full version of the document).The paragraph under summary and cumulative impacts is disjointed and unclear. The clause needs to distinguish more between | It is noted that the role of the voluntary and community sector in delivering community infrastructure is of strategic importance. |

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| <p>Ms Jeanne Taylor (Lee Evans Planning) on behalf of Pentland Homes</p> | <p>green infrastructure transport and built infrastructure. Recognition of the voluntary and community sector would help. Mitigation measures need clarification.</p> <p>It is submitted that the identified 'Negative Effects' are not a barrier to the allocation and development (proposed development in Eythorne).</p> <p>First Tier Constraints- although a site is within 5km of an AONB and a Natura 2000/Ramsar site this is not a barrier to development</p> <p>Second Tier Constraints Groundwater Protection Zone - provided that appropriate steps are taken there will not be any adverse impact.</p> <p>Conservation Area - development can be designed in a way that does not harm the Conservation Area. Special Landscape Area - broad brush designation that covers many villages and large parts of the countryside. Built up area - development on a peripheral site will not adversely affect the wider countryside</p> | <p>Triggering a 'red' score against a particular constraint merely flags up to the Council that there are locational sustainability constraints that will require further consideration</p> |
| <p>Ward Homes c/o Barratt Kent Ltd(Ward Homes c/o Barratt Kent Ltd)</p> | <p>Objection to the Appraisal FID13 of Volume 2, Site Appraisals as:Care should be taken over the use of Agricultural Land Classification data. The 1:250,000 DEFRA mapping has been used by the Council's consultants to establish the classification of sites. However, DEFRA advises that this mapping is not intended to be applied on a site-specific scale as it is not accurate at this level. DEFRA advises that even the (now discontinued) 1:63,360 mapping was only accurate for parcels of 80ha or more. A site specific agricultural land classification assessment was undertaken in respect of the site some years ago and identified that the site fell into category 2a. As the value of land changes very slowly, the results of this assessment are likely to remain valid. The SA/SEA is therefore incorrect in stating that the site comprises Grade 1 Agricultural land and should be amended accordingly.</p> | <p>It is agreed that care should be taken when using the agricultural land classification data to assess a site. As a minimum it should be recognised that this is only a broad indication of likely agricultural land quality, and that further investigations will be needed to ascertain the actual agricultural land classification.</p> |

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| <p>Ward Homes c/o Barratt Kent Ltd (Ward Homes c/o Barratt Kent Ltd)</p> | <p>The Sustainability Appraisal of the Site Allocations DPD fails to assess the option for development west of Whitfield at Singledge Lane. The site at Singledge Lane is listed in Appendix C of the Site Allocations DPD (preferred options draft) as site DOV06, falling into the category of 'Other Residential Sites Considered'. It is given a site area of 9.1ha (the actual site area is 9.62ha). It falls within the broad area of search 'west of Whitfield' and its development as part of strategic scale development at Whitfield has been appraised in the Sustainability Appraisal of the Core Strategy. However, whilst it could form part of a strategic development west of Whitfield, the site has been and continues to be promoted as a medium scale site in its own right. Unlike land further to the north west of the strategic search area, the site is not "particularly sensitive to visual landscape impacts" (see Sustainability Appraisal of Core Strategy). Medium scale development could be undertaken without the need for strategic infrastructure, unlike larger scale development west of Whitfield. The transport model commissioned by the District Council, County Council and Highways Agency has been used to assess the impact of development of 250 homes at the site in addition to the Core Strategy Preferred Option (10,000 units including 1,800 east of Whitfield) and has found that the impact would be very limited and the development could be accommodated with limited local junction improvements. It also has the potential to pump prime access and public transport improvement initiatives in support of more strategic development at Whitfield. As assessment of the site in accordance with the methodology used by the District Council is set out below. It should be noted that whilst the assessment includes highlights the proximity to AONB, Natura2000/Ramsar sites, SSSI, Groundwater Protection Zone and Special Landscape Area, this is true of many sites proposed for allocation in the draft Site Allocations DPD. Furthermore, the assessment is very broad in nature and it should not be assumed that</p> | <p>This appraisal of the site against the locational constraints appears to be robust, and should be taken account of by the Council, should they wish to consider this site.</p> |

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| | development of the site would harm landscape, ecology or water supply. | |



Appendix 2 Analysis of Representations Received on the HRA

A total of 23 representations were made on the Preferred Options HRA by five people or organisations (RSPB, Kent Wildlife Trust, Crest Strategic Projects Ltd, Shepherdswell Parish Council and Mr. Maxwell McDowell). Natural England, in their overall comments on the Core Strategy did not comment in detail on the HRA other than to acknowledge that they agreed with our recommendations.

The RSPB's comments were generally supportive but included the statement that "*The features of the Thanet Coast and Sandwich Bay SPA are not listed correctly. In addition to turnstone, golden plover and little tern are features on the SPA citation. The mistake has been made because the JNCC website lists the 2001 SPA review, which just recorded turnstone in qualifying numbers. However, the 2001 SPA review has not been used to update the SPA citations, therefore, the original citations and qualifying features still stand. It is important to include golden plover in the assessment because golden plover use the wet grassland part of the sites, whereas turnstones just use the beach. Therefore, if golden plover are missed out of the assessment, impacts on the wet grassland could be missed out*"

The correction regarding golden plover and little tern have been added to the list of European Interest features in this updated (January 2008) version of the HRA report.

The observations and objections raised by Mr. Maxwell McDowell and Shepherdswell Parish Council, although made in response to the HRA, covered broader issues with the Core Strategy and Sustainability Appraisal than adverse effects upon European sites and are therefore not appropriate for further consideration in this particular report.

Kent Wildlife Trust made a very detailed submission which broadly accepted the assessment itself but expressed concerns over the proposed mitigation/avoidance measures. It is considered that the detailed comments merited a point by point response and this is contained within the Table below.

| Kent Wildlife Trust Comment | Scott Wilson Response |
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| <p>The proposed mitigation measures are couched in generalised terms. For example, the assessment recommends that '<i>Policy DM15 should be strengthened to make specific reference to the need to alleviate pressure on the A2 in the vicinity of Lydden and Temple Ewell Downs SAC</i>'. No indication is given as to an effective wording for such policy, nor the degree to which pressure would need to be alleviated.</p> | <p>To a large extent generalised terms are unavoidable where a strategic land use plan such as a Core Strategy is concerned. With regard to the specific example cited, we have deliberately avoided providing specific policy wording, preferring to provide a recommendation that allows the local planning authority to determine the exact form of words to use. This enables us to maintain a separation between the people undertaking the HRA and the people writing the Development Plan Document. We have also not stipulated a '<i>degree to which pressure would need to be alleviated</i>' in this case because that particular recommendation was intended to require developers and development control officers to take air quality (along these specific roads within these specific locations) into account in planning applications/decisions and therefore does not need a specific degree of pressure to be identified in order to serve its function.</p> |

| Kent Wildlife Trust Comment | Scott Wilson Response |
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| <p>Some measures appear to be outside the control of the Local Planning Authority, particularly the proposed mechanism for avoiding recreational impacts at Sandwich Bay, which the assessments notes can only be delivered outside Dover district. It is unclear how the Core Strategy will be able to demonstrate that the impacts of its policies will be avoided in such a case.</p> | <p>Our comments have been misunderstood. There is no reason why the mitigation for recreational impacts on Sandwich Bay SAC/Thanet Coast & Sandwich Bay SPA/Ramsar site would need to be provided outside the district. Rather, it is our view that to fully offset the 'in combination' effect caused by the development within Dover and surrounding districts a coordinated approach by the local planning authorities in conjunction with Natural England would be necessary. However, Dover District's contribution would be entirely within the control of the Council.</p> |
| <p>No assessment appears to have been undertaken to identify whether there is any potential to [actually] create new open space of the type, size and location required to mitigate potential recreational impacts upon Natura 2000 sites.</p> <p>Nor is it clear that such provision could be funded.</p> <p>Neither can there be any certainty that it is within the power of the Local Plan Authority to alleviate traffic pressure on the A2 or to secure an improvement in air quality in the district in such a way that it mitigates any potential increase in aerial pollution in the vicinity of sensitive sites: such aspirational targets have no place in a document of this kind.</p> | <p>According to the Dover Greenspaces Strategy of 2004, there are 457.15 hectares of natural and semi-natural green space spread across 36 sites. Even excluding the designated nature reserves, this leaves 278ha of undesignated but accessible 'natural' greenspace. Accessible natural and semi-natural greenspace therefore currently comprises the single most extensive type of green space in Dover district. As yet no study has been undertaken to determine the existing or future recreational 'capacity' of these existing sites, but if such a study indicated that any areas were 'under capacity', these could count towards the allocation required to minimise adverse effects on European sites. There is also considerable opportunity for the provision of accessible natural greenspace on new sites given that so much of Dover district is rural and undeveloped. We acknowledge that the draft standards of provision could be clarified regarding the scale and location of site provision and that has been done as part of this current iteration of HRA.</p> <p>A mechanism for funding such provision (such as a Developer Contributions policy) is mentioned in throughout the report. It is worth noting that the only developer that commented upon the HRA (Crest Strategic Projects Ltd) stated that they believed that developer contributions were workable in this context.</p> <p>It is necessary to be realistic when devising mitigation measures to be incorporated within a Core Strategy. It is generally not possible to predict in advance the precise scale of impact or improvement that can be delivered by a given mitigation measure for those measures which are available at the strategic planning level since a policy to '<i>require developers to produce travel plans indicating that they have maximised opportunities for sustainable transport</i>', for example, cannot be directly linked to a specific</p> |

| Kent Wildlife Trust Comment | Scott Wilson Response |
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| | <p>reduction in the number of vehicles, although a specified reduction can be set as a monitoring target against which the success or failure of mitigation measures can be defined. Despite this, our view is that it would not be proportionate to conclude as a result of these knowledge gaps that there is no way that any development could ever be accommodated (since the absence of evidence is due to the novel nature of the mitigation tools available and the limitations of the science, rather than any indication that a problem exists) and have taken the view that the most reasonable approach is to require the LDF to:</p> <ul style="list-style-type: none"> • incorporate an extensive suite of measures to encourage the use of sustainable transport, maximize the provision of such transport and discourage car use as far as possible; • require planning applications to undertake transport assessments through which it can be demonstrated that all opportunities are being taken for minimizing car use; and • couple these measures with monitoring of the air quality in the European site before and for a number of years after introduction of the measures, such that further measures can be devised if the air quality does not improve. |
| <p>No indication is given how recreational pressure is to be directed towards the new open space to be provided. Access restrictions, wardening and other such measures are not an alternative to provision of new open space, but a necessary adjunct if the mitigation is to be successful.</p> | <p>Agree. We do include access and site management measures in our recommendations, but it is true that they were couched as an alternative to the provision of alternative greenspace. This updated version of the HRA report includes an amendment to our recreation recommendations to clarify the intention.</p> |
| <p>No indication is given as how the various mitigation measures should be triggered. What level of development, for example, would trigger measures to limit traffic flows on the A2?</p> | <p>We would intend the air quality measures to be introduced from the time of adoption of the Core Strategy. With regard to recreational pressure, water quality and water resources we have identified 'triggers' in terms of linking the measures explicitly to the pace of development.</p> |
| <p>In some cases, the buck is passed to individual development proposals, as when it is suggested that any development that could give</p> | <p>'<i>Buck passing</i>' implies that no action is proposed at the district scale. The quoted measure is only one of a suite of five measures (four of which are directly targeted at local air quality). The fact that one of the measures would direct</p> |

| Kent Wildlife Trust Comment | Scott Wilson Response |
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| <p>rise to material increase in traffic flows on the A20 should be subject to appropriate assessment. This is entirely inappropriate given that it is clearly identified that expansion of Dover Port, a development critical to Dover's regeneration and central to the LDF, will be one of those developments... there is a real likelihood that the proposed port expansion could fail unless it can be made to happen in a way that avoids any increase in traffic on the A20. Deliverability is central to a sound Core Strategy, and therefore the mechanisms for avoiding any impact on Natura 2000 sites from strategically important developments must necessitate a strategically planned solution. Where developments are spatially constrained (as with Dover Port), avoidance mechanisms are likely to require spatial planning as well.</p> | <p>individual applications to consider the air quality along the A20 and A2 within their Appropriate Assessments is an acknowledgement of the fact that:</p> <ul style="list-style-type: none"> • many scheme details that would be necessary to fully evaluate the air quality impacts in detail are never available until the project level and therefore project level appropriate assessment is necessary to close the issue completely; and • many of the most effective mitigation measures to control air quality on the A20 or other roads cannot be delivered or targeted as part of a Core Strategy but only available at the project level (e.g. controlling the number of vehicle journeys generated by a particular commercial development). <p>The expansion of Dover Port is not within the control of the Council in that it is determined by the Harbour Board through the Harbour Revision Order process rather than by the Council through the planning system. The Council do state their expectations for the port expansion in paragraph 7.10 of the Core Strategy in that: <i>"The Council would want to ensure that the opportunity to develop a second terminal at the Western Docks is used to improve the existing local traffic and environmental conditions, which would mean looking again at the strategic routeing of traffic"</i> and in Statement 2, where they state that: <i>"The District Council supports the development of a freight and passenger ferry terminal at Dover Western Docks provided... it includes the implementation of an access strategy that improves environmental conditions on the A20 Dover urban sections and enables a rail freight connection [and that]... pollution issues (air quality, noise and light) are fully addressed."</i> While we would recommend that the reference to 'urban sections' of the A20 is expanded to refer to Folkestone to Etchinghill Escarpment SAC it seems clear that the Council has done the most it can to influence the environmental effects of the port expansion given that it is outside their direct control.</p> <p>With regard to the impacts of the Core Strategy in conjunction with the expansion of the Port, the issue is one of an 'in combination' effect and the Core Strategy cannot reasonably be expected to mitigate for the effects of other plans or projects but only for its own contribution (through for example the scale of housing delivery during the same time period)⁽¹⁾. The local authority cannot realistically close</p> |

1 This view is supported by comments made by Natural England in other regions, for example in their response to the North West Regional Spatial Strategy

| Kent Wildlife Trust Comment | Scott Wilson Response |
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| | <p>or re-route the A20, prohibit vehicles from using it, or introduce a toll for the section of road that runs adjacent to the SAC, while much of the port-related traffic that will use the route will not arise from within Dover district and therefore cannot be controlled by the Council at the point of origin. In terms of mitigating the Core Strategy's contribution to any 'in combination' effect, therefore the Core Strategy already states in policy DM15 (Location of Development and Travel Demand) that developments that would generate high levels of travel will <u>only</u> be permitted where locations will be well served by a range of transport options.</p> <p>When this is coupled with the measures we have recommended, it is difficult to see what more the Core Strategy could do to minimise its contribution to the overall increase in traffic flows on the A20 or to facilitate the use of transport routes other than the A20 by vehicles associated with the Port.</p> |

The representations of Crest Strategic Projects Ltd (CSP) seek the adoption of Option 4 with development to the east and west of Whitfield (Option D of the Submission Core Strategy) and the construction of a new A2 / A256 link. They comment that, "whilst the A2 would be down-graded between the western end of the new link and the Whitfield roundabout, it would still function as a route with the centre of Dover. As a consequence, it would remain a significant barrier in terms of 'spill over' recreational pressure." However, since there is an existing footpath crossing the SAC and a Public Right of Way along the Temple Farm underpass, it is our view that the 'barrier' effect of a downgraded A2 may not be as effective as CSP anticipate. Crest Strategic Projects Ltd also expressed support for the sentiment that major development at Whitfield, associated with the construction of a new A2 / A256 link, has the potential to lead to a reduction in the level of air pollution at the Lydden and Temple Ewell Downs SAC.

CSP also commented that "Paragraph 6.10 [of the HRA] suggests that Option 4 would appear to be the least favoured option due to the increase in recreational pressure on the SAC. Crest Strategic Projects do not agree with this assessment since Option 4 brings with it the ability to both plan comprehensively and to provide the full social and physical infrastructure necessitated by the development. This would include the list of mitigation measures set out in paragraph 6.11 [of the HRA]". Option 4 is nonetheless the least favourable of the four options with regard to impacts on this particular European site as a result of the greater proximity of development that would be delivered.

