Dover District Council New Local Plan

Sustainability Appraisal Scoping Report

Prepared by LUC
February 2018
**Project Title:** Sustainability Appraisal Scoping Report

**Client:** Dover District Council

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1 Introduction

1.1 Dover District Council commissioned LUC in 2017 to carry out Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Review of the New Local Plan.

1.2 SA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging Plans and Policies, including their alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.

1.3 The purpose of this Scoping Report is to provide the context for, and determine the scope of, the SA/SEA of the Review of the Local Plan and to set out the framework for undertaking the later stages of the SA/SEA.

1.4 The Scoping Report starts by setting out the policy context of Dover District’s New Local Plan, before describing the current and likely future environmental, social and economic conditions in the District. This contextual information is used to identify the key sustainability issues and opportunities that the New Local Plan can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan, including strategic policies, site allocations and development management policies. Figure 1.1 simply illustrates this process. The purpose of this consultation is to seek views on this framework in particular:

- Whether the scope of the SA is appropriate as set out considering the role of the Dover New Local Plan to help meet and manage Dover District’s needs.
- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Dover New Local Plan.
- Whether the Scoping Report identifies the significant SA issues which the Dover New Local Plan can make a significant contribution towards addressing.
- Whether there are any additional SA issues relevant to the New Local Plan that should be included.
- Whether the SA framework is appropriate and includes a suitable set of SA objectives and site-based assumptions for assessing the effects of the options included within the Dover New Local Plan and reasonable alternatives.

Figure 1.1: Sustainability Appraisal Scoping Process

1.5 Dover District lies on the East Kent peninsula in between Thanet to the north, Shepway to the south west and Canterbury to the north west. To the south and east of the District is the English Channel (see Figure 1.2).

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

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

1.8 Current trends in relation to the various social, economic and environmental issues affecting Dover are described in more detail in the subsequent chapters. Without the implementation of the Local Plan, such trends are likely to continue. However, the adopted Core Strategy and Land Allocations Local Plan will go some way towards addressing many of the issues. In most cases, the emerging Review of the Local Plan offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.
Figure 1.2

Dover District Boundary

Other Planning Authority Boundaries

Source: LUC, DDC, NE

Map Scale @ A4: 1:400,000
Dover District Local Plan

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

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

- The Regional Spatial Strategy used to determine the scope of the Core Strategy and the housing need of the Plan period has since been revoked and replaced by a National Planning Policy Framework (NPPF) and Guidance (NPPG) in 2012. The NPPF and NPPG require the preparation of clear, streamlined Local Plan documents as opposed to multiple development management documents.

- The Government published a new White Paper on housing policy1, which sets out a new standard approach for local authorities to follow when assessing housing need and preparing their 5 year housing supply requirements.

1.11 Consequently, the Council is in the process of updating its evidence base to support the Local Plan to 2037. The Local Plan document will include strategic and detailed site allocation and development management policies to meet and manage the District’s housing, employment and other land use needs, as well as protect and conserve the District’s natural, cultural and historic assets.

Other Local Plan Documents

1.12 The Council does not currently operate a Community Infrastructure Levy (CIL). Funding sources for infrastructure delivery will be investigated alongside the Local Plan in the form of an Infrastructure Delivery Plan.

1.13 New Neighbourhood Planning measures that came into force in April 2012 allow communities to shape new development by coming together to prepare Neighbourhood Plans. These Plans must be in general conformity with higher tier plans in the Local Plan. Worth Parish Council adopted its Neighbourhood Plan in 2014. Ash Parish Council is in the early stages of preparing its Neighbourhood Plan.

Sustainability Appraisal and Strategic Environmental Assessment

1.14 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations2. Therefore, it is a legal requirement for the Local Plan to be subject to SA and SEA throughout its preparation.

1.15 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance3), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Dover. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.16 The SA process comprises a number of stages, with scoping being Stage A as shown in Figure 1.3 below:

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1 HM Government, Fixing our broken housing market, February 2017
2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)
1.17 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

1.18 There are a wide range of other international agreements and EU Directives, which have been transposed into UK law or through national policy, which are summarised in the relevant subject area chapters.

**National Planning Policy Framework**

1.19 The most significant national policy context for the Local Plan is the National Planning Policy Framework (NPPF). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

1.20 The NPPF also requires Local Plans to be ‘aspirational but realistic’. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.

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

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.22 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;

be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;

indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;

allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;

identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;

identify land where development would be inappropriate, for instance because of its environmental or historic significance; and

contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Proposed Changes

An updated NPPF will be published in Spring 2018, following its consultation held between December 2015 and February 2016. The government is proposing changes to the following areas:

- Broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to own their new home;
- New policy to increase the density of development around commuter hubs, to make more efficient use of land in suitable locations;
- New policy to supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans; and
- New policy to support the delivery of starter homes.

Approach to Scoping

This Scoping Report fulfils the requirements set out in Figure 1.4 above with a view to establishing the likely significant effects of constituent parts of the Local Plan in isolation and in combination. In accordance with NPPG the Scoping Report is proportionate and relevant to the Dover Local Plan, focussing on what is needed to assess the likely significant effects.
### Meeting the Requirements of the SEA Regulations

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

**Table 1.1: Meeting the Requirements of the SEA Regulations**

<table>
<thead>
<tr>
<th>SEA Regulations’ Requirements</th>
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<tr>
<td><strong>Environmental Report</strong></td>
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<td>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).</td>
<td>The full SA Report produced to accompany consultation on the Dover Local Plan will constitute the ‘environmental report’ as well, and will be produced at a later stage in the SA process.</td>
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<td>1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</td>
<td>Chapters 2 to 9.</td>
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<td>2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</td>
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<td>3) The environmental characteristics of areas likely to be significantly affected.</td>
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<td>4) 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 on the conservation of wild birds and the Habitats Directive.</td>
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<td>5) 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.</td>
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<td>6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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<td>7) 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.</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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<td>8) 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.</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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<td>9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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<td>10) A non-technical summary of the information provided under paragraphs 1 to 9.</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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**SEA Regulations’ Requirements** | **Covered in this Scoping Report?**
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The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:
(a) current knowledge and methods of assessment;
(b) the contents and level of detail in the plan or programme;
(c) the extent to which the plan or programme in the decision-making process; and
(Regulation 12 (3))
This Scoping Report and the Environmental Reports will adhere to this requirement.

**Consultation**
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.
(Regulation 12(5))
This Scoping Report will be circulated to the consultation bodies Natural England, Environment Agency and Historic England for comments.

Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.
As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:
(a) send a copy of those documents to each consultation body;
(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive (“the public consultees”);
(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.
The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.
(Regulation 13 (1), (2), and (3))
This Scoping Report will be published on Dover District Council’s website. Public consultation on the Local Plan and accompanying SA will continue as the Plan develops, including the Final Draft and Proposed Submission versions of the Plan.

Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:
(a) notify the Secretary of State of its opinion and of the reasons for it; and
(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.
(Regulation 14 (1))
Unlikely to be relevant to the Local Plan, as there will be no effects beyond the UK.

**Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)**
As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:
(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.
(Regulation 16(1))
Requirement will be met at a later stage in the SA process.

As soon as reasonably practicable after the adoption of a plan or programme:
(a) the responsible authority shall inform (i) the consultation bodies; Requirement will be met at a later stage in the SA process.
**SEA Regulations’ Requirements**

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<td>(ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars: (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</td>
<td>Requirement will be met at a later stage in the SA process.</td>
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**Monitoring**

The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))

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**Habitats Regulations Assessment**

1.27 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

1.28 The HRA process for the Dover Local Plan will be undertaken separately from the SA and will need to consider the potential for adverse effects on the integrity Natura 2000 and Ramsar sites within the District both alone and in combination with development proposed in neighbouring authorities’ plans. These sites are:

- Dover to Kingsdown Cliffs SAC.
- Dungeness SAC.
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site.
- Folkestone to Etchinghill Escarpment SAC.
- Lydden and Temple Ewell Downs SAC.
- Parkgate Down SAC.
- Sandwich Bay SAC.
- Stodmarsh SAC, SPA and Ramsar site.
- Thanet Coast SAC.
- Thanet coast and Sandwich Bay SPA and Ramsar site.

1.29 The findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

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**Structure of the Scoping Report**

1.30 This chapter describes the background to the production of the Dover Local Plan and the requirement to undertake SA and other assessment processes. The remainder of this Scoping
Report is structured around a set of SA subject areas designed to draw out the full range of likely effects generated by the Dover Local Plan, including all the SEA topics listed in Annex I(f) of the SEA Directive (see Section 6 in Table 1.1). Each chapter sets out the policy context, baseline, SA issues and SA objectives for each SA subject area. The subject area chapters are as follows:

- **Chapter 2**: Population Growth, Health and Wellbeing.
- **Chapter 3**: Economy.
- **Chapter 4**: Transport Connections and Travel Habits.
- **Chapter 5**: Air, Land and Water Quality.
- **Chapter 6**: Climate Change Adaptation and Mitigation.
- **Chapter 7**: Biodiversity.
- **Chapter 8**: Historic Environment.
- **Chapter 9**: Landscape.

1.31 SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis.

1.32 Relevant baseline information will be updated during the SA process as and when data is published.

1.33 **Chapter 10** draws together all the SA objectives defined at the end of each chapter to present the full SA Framework for the appraisal of the Dover Local Plan and its reasonable alternatives, including key assumptions to be used to appraise site options. Finally, **Chapter 11** describes the next steps to be undertaken in the SA of the Dover Local Plan.
2 Population Growth, Health and Wellbeing

Policy Context

International

2.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998): Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

2.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002): Sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

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

National

2.4 National Planning Policy Framework (NPPF)\(^4\) contains the following:

- The NPPF promotes "strong, vibrant and healthy communities" and "sustainable, inclusive and mixed communities".
- One of the core planning principles is to "take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs".
- Local planning authorities should "boost significantly the supply of housing" to meet the "full, objectively assessed needs for market and affordable housing". A Strategic Housing Market Assessment should be completed to assess the full housing needs of the local area, including the scale, mix and range of tenures required/ Local planning authorities should work with neighbours where housing market areas cross administrative boundaries.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.
- The NPPF states "good design is a key aspect of sustainable development" and requires development to add to the overall quality of the area over its lifetime. The importance of good architecture and appropriate landscaping to reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places is emphasised.
- The NPPF promote the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.

There is a need to take a “proactive, positive and collaborative approach” to bring forward development that will “widen choice in education”, including sufficient choice of school places.

Health and wellbeing should be considered in local plans. They should promote healthy lifestyles, social and cultural wellbeing and ensure access by all sections of the community is promoted.

2.5 National Planning Policy Guidance (NPPG)

Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

2.6 Select Committee on Public Service and Demographic Change report Ready for Ageing:

warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

2.7 Fair Society, Healthy Lives:

investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

2.8 Planning Policy for Traveller Sites:

Sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

2.9 Housing White Paper 2016 (Fixing our broken housing market):

Sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

2.10 Laying the foundations: a housing strategy for England:

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

2.11 Healthy Lives, Healthy People: Our strategy for public health in England:

Sets out how our approach to public health challenges will

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


- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing, and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

2.12 **A Green Future: Our 25 Year Plan to Improve the Environment**\(^{12}\): Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Embed an ‘environmental net gain’ principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.
  - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
  - ‘Green’ our towns and cities by creating green infrastructure and planting one million urban trees.
  - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

**Sub-National**

2.13 **Kent and Medway Growth and Infrastructure Framework (GIF)**\(^{13}\): Sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. Identifies the following capacity issues in Dover District:

- Significant capacity issues at primary schools around Dover and Deal (although authority-wide surplus).
- GP capacity surplus across authority.
- Authority wide dental capacity low.

2.14 The GIF summarises the need for future infrastructure projects in Dover, including major housing developments (Whitfield, Aylesham and Connaught Barracks); education facilities (new primary schools at Whitfield and expansion of secondary schools from 2018); and employment sites.

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(White Cliffs Business Park, Discovery Park, Western Docks, Batteshanger Colliery Pithead and St James Area).

2.15 **East Kent Growth Framework**\(^{14}\): Sets out an overarching strategic approach for identifying investment priorities to achieve long-term economic growth across East Kent between 2017 and 2027. The Framework incorporates the five East Kent districts of Ashford, Canterbury, Dover, Shepway and Thanet. There are four key objectives:

- Unlocking growth through infrastructure – identified sites for development need supporting transport and digital infrastructure, particularly targeted upgrading and making better use of road and rail networks (particularly High Speed 1) to enhance domestic and international connectivity while enabling local accessibility.

- Delivery of business space – the next-generation of modern commercial space for business start-ups, encouraging existing businesses to scale-up and helping attract new mobile investment into the area while driving forward the development of brownfield sites.

- Supporting skills and productivity within business – creating an environment for innovation in productivity improvements, supporting businesses to grow and move up the value chain, encouraging faster broadband, ensuring that businesses have the skills to grow and that the region’s skills base continues to improve, and is linked to the success of higher education and further education sectors creating talent.

- Place making and shaping – improving the perception of people’s idea of East Kent and make it a location of first choice that retains and attracts young people, families and entrepreneurs, while at the same time maximising the potential of the natural assets, enhancing town centres and ensuring a high quality built environment.

2.16 Of these four key objectives, unlocking growth through infrastructure is considered to be the most important and focuses on securing delivery of critical infrastructure projects, working with industry bodies and other bodies where necessary.

2.17 **Lighting the way to success: The EKLSP Sustainable Community Strategy**\(^{15}\): The document sets out the clear, long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030:

- East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-targeted housing supply, and connections to London, the South East and Europe.

- There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.

- Outreach programmes will be used to promote opportunities for education in the community. They will help to raise people’s aspirations, increase their potential stake in local economic success ad bring together groups that might otherwise be marginalised, including the elderly, ethnic minorities and those seeking to return to work.

- The current inequalities in prosperity, prospects and living conditions will have receded significantly.

- Imbalances in the health and life expectancy of East Kent’s citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and anti-social behaviour; poor

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quality, bad managed housing will have been upgraded and will no longer represent a magnet for further disadvantage; and communities will be at ease with the natural diversity.

Current baseline

Population

2.18 Dover District contains the three towns of Dover, Deal and Sandwich and a large rural area with a great variety of villages including those associated with the former East Kent Coalfield. Mining activity and other industrial uses have left a legacy of isolated pockets of derelict and despoiled land in parts of the District which contrasts with the natural and historic beauty of the District. In 2016 the population of Dover was 114,200 people, the fourth smallest local authority population in Kent. The working age population of Dover was 67,800 people.

2.19 In the future, over the period 2014-2037 the projections show that the population of Dover District will increase from 113,100 to 127,200 people. This is predominantly due to domestic migration flows, as natural change is negative (i.e. more deaths than births).

2.20 The ONS 2014 SNPP shows Dover District will attract nearly 18,500 new residents via migration over the period 2014-2037. Most of this migration is 'domestic' flowing from elsewhere in the UK.

2.21 Natural change will however continue to be negative, with the ONS 2014 SNPP projecting increases of about 550 deaths and 480 births per annum between 2014 and 2037.

2.22 With regard to demographics, the number of people aged 90+ will increase significantly from 1,279 people in 2014 to 3,603 people in 2037.

Gypsy, Traveller and Travelling Showpeople

2.23 The East Kent Gypsy, Traveller and Travelling Showpeople Accommodation Assessment found that there is no requirement for accommodation in Dover District between 2013 and 2027.

Housing

2.24 An updated Gypsy & Traveller Accommodation Needs Assessment is currently under way, which will provide further information once complete.

2.25 Dover District contains two urban areas (Dover and Deal), a market town (Sandwich) and a large number of villages. In general, Sandwich and the north of the District are the most expensive parts of Dover District, while Dover Town and the south of the District are the cheapest. Prices in Deal are notably cheaper than Sandwich, but more expensive than Dover Town.

2.26 The 2011 Census showed that the number of households in Dover District increased by 9% since 2001, reaching 48,310 households in total. This compares to the regional average of 8.2% and the national figure of 7.9%. In the District the number of households rose at a faster rate than...
the population in households between 2001 and 2011. This implies that the average size of households is falling across the District. The same trend is recorded regionally and nationally\(^{23}\).

2.27 The 2011 Census also showed that there were more single person households and few couple households with dependent children in the District than recorded regionally and nationally. Furthermore, over the period 2001 to 2011 the main change in household types was a growth in 'other' households, followed by lone parent households with no dependent children. However, the households with only non-dependent children increased while the number of households with dependent children decreased. This suggested that household formation rates amongst young adults may have reduced\(^{24}\).

2.28 The 2011 Census indicated that 24.8% of households in Dover District were older person only households (households where all members are 65 or over), compared to 21.9% regionally and 20.5% nationally. Of these older person only households in Dover District in 2011, 59.1% contained only one person, a higher proportion than that recorded in the South East region (57.7%) but lower than the figure for England (60%)\(^{25}\).

2.29 The District’s Strategic Housing Market Assessment (SHMA)\(^{26}\) which underpins this Local Plan recommends an OAN of 529 dpa (12,176 dwellings) over the period 2014-2037. More specifically, the OAN projections indicate that the population aged 65 or over is going to increase drastically over this period. The SHMA concludes a tenure split of 79% Market Housing, 16.3% Affordable/Socially Rented Housing 4.7% Shared Ownership.

2.30 A Housing Viability Assessment will be undertaken as the preparation of the District Local Plan advances. This work will provide further information once completed.

**Education**

2.31 Skill attainment levels in the District have improved over the last ten years. The percentage of residents of working age without qualifications has decreased and is now lower than the Kent average\(^{27}\). The percentage of working age residents with NVQ 4 qualifications increased from 27.8% to 32.9%, between 2015 and 2016 respectively\(^{28}\).

2.32 The Kent and Medway Growth and Infrastructure Framework (GIF)\(^{29}\) highlights significant capacity issues at primary schools around Dover and Deal (although authority-wide surplus). According to the Commissioning Plan for Education Provision in Kent\(^{30}\), the number of primary age pupils is expected to continue rising significantly from 123,027 in 2016-17 to 128,905 in 2021-22, which is just under 6,000 extra pupils over the next five years. In the same period the number of secondary age pupils in Kent schools is expected to rise significantly from 79,110 in 2016-17 to 91,520 in 2021-22, a rise of 12,000 pupils. KCC will address these increasing school pupil numbers by expanding existing schools and creating new primary, secondary and special schools.

2.33 The need for additional school places in the County has been recognised by Government with a further £15.5m basic need allocation for 2019-20. The allocation for 2020-21 will not be known until spring 2018. However, price inflation in the construction industry and the sheer number of


places, particularly in the secondary sector, continues to make KCC’s capital funding challenging and they are presently estimating a shortfall of £101m in respect of places required by 2020.

**Deprivation**

2.34 The English Indices of Deprivation 2015 reinforce previously identified patterns of deprivation across the District. Dover District continues to have deprivation ‘hot spots’ that are amongst some of the most deprived small areas in the country yet are geographically close to some of the least deprived areas in the country.

2.35 When compared with other local authorities in Kent and England as a whole, the District of Dover is in the bottom half of the country’s most deprived local authorities. Dover is ranked 126 nationally (1 being the most deprived), out of 326 English local authority districts. Out of the 12 Kent local authority districts, Dover District is ranked 5. In general, deprivation and unemployment figures are high for Dover Town, with many wards in Dover Town placed in the worst 10% deprived areas in England. The four Lower-layer Super Output Areas (LSOAs) that fall within the most deprived 10% of LSOAs nationally fall within the wards of St Radigund’s, Castle, Maxton, Elms Vale & Priory, and Buckland (all located within Dover Town). The LSOA that falls within St Radigund’s ward falls in the top 5% most deprived areas in the country. Figure 2.1 illustrates the indices of multiple deprivation across the District.

**Health**

2.36 The health of people in Dover is varied compared with the England average. The rate of alcohol-related harm hospital stays is 532 (rate per 100,000 population), which is better than the average for England. However, estimated levels of adult excess weight are worse than the England average. Life expectancy is 7.7 years lower for men and 2.7 years lower for women in the most deprived areas of Dover than in the least deprived areas.

2.37 About 23% (4,400) of children live in low income families. In Year 6, 21.5% (232) of children are classified as obese. Levels of GCSE attainment and smoking at time of delivery are worse than the England average.

2.38 According to Public Health England, priorities in Dover include improving life expectancy by preventing suicide, heart disease and reducing smoking prevalence, improving teenage pregnancy rates, and improving physical activity in children and adults.

**Open Spaces, Sport and Recreation**

2.39 There is a vast array of open spaces in the Dover District, including major municipal parks, gardens, local nature reserves, promenades, sports pitches and various informal grass areas.

2.40 With regard to accessible green space, an assessment of current provision against the accessible green space standards shows that in general the quantity of provision is acceptable. As such, raising quality standards at existing sites instead of creating new spaces is a high priority. The Parks and Amenity Open Strategy (2013) details how almost all towns and villages in Dover District contain accessible open space of some type. The main gap identified was a lack of strategic level provision in Sandwich.

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32 Lower-Layer Super Output Areas (LSOAs) are small geographical areas with approximately 1,500 residents or 650 households
2.41 The Council’s Green Infrastructure Strategy\(^{38}\) reports the District’s wide range of extremely high quality Green Infrastructure (GI) assets. It identified the country parks of Samphire Hoe and Fowlmead alongside the major formal parks (such as Kearsney Abbey, Russell Gardens, Connaught Park, Pencester Gardens and Victoria Park, Deal) to be the most significant in terms of accessible green space.

2.42 An extensive public rights of way network covers much of Dover District and includes the strategic routes of the White Cliffs Country Trail and North Downs Way. Given the importance of accessibility to GI issues the network has the potential to play an important role in the GI strategy\(^{39}\).

2.43 With regard to sport and recreation, the Playing Pitch and Outdoor Sports Facility Strategy\(^{40}\) suggests that current provision of almost all pitch types either just meets demand or is deficient. The most severe deficiencies occur in Dover, while provision of youth football pitches appears to be deficient everywhere in the District. There is little in the way of spare capacity except in the case of mini-football. Figure 2.2 illustrates a range of services and facilities across the District.

2.44 There is some spare capacity for non-pitch sports facilities such as bowls and outdoor tennis provision, although there are issues regarding the quality of ‘pay and play’ outdoor tennis courts. The assessment also found that there are no publicly accessible netball facilities in the Deal area\(^{41}\).

2.45 Deficiencies in ancillary facilities sometimes present a barrier to participation. For example, a major issue for rural football clubs is the quality of changing facilities. In addition, cricket and rugby clubs require separate changing facilities for cricket umpires. There is also a current lack of female changing facilities for rugby and cricket\(^{42}\).

2.46 An Open Space, Sport & Play Study and updated Green Infrastructure Strategy due to be started this year, will provide further information once completed.

Crime

2.47 At present, the rate of violent crime in Dover is growing\(^{43}\). There has been a steady increase in total annual crimes over the past five years, with highest numbers recorded in the second half of 2017\(^{44}\).

Noise and Odour

2.48 There are several notable land uses within the District which have the potential to affect existing and new communities within close proximity to them. Major roads such as the M20/A20, M2/A2 and A21 generate noise and air pollution which has the potential to affect those living in nearby areas, particularly during peak traffic times. Dover is the world’s busiest roll on roll off ferry port, with ferries departing for France every 20 minutes. The Port of Dover also serves as a major International Cruise ship terminal\(^{45}\). Altogether there are 10 railway stations located in the District. Within Dover District, Dover Priory railway station is the busiest. South Eastern Railway provides a high speed rail service to and from London in one hour. There are no airports located within the Dover District. However, there are plans to reopen Manston Airport in the neighbouring District of Thanet as an airfreight hub of national significance. If consented, noise from the operational airport has the potential to adversely affect Dover communities on flight


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Dover District Council New Local Plan 18 February 2018
paths to and from the airport. Consultation on the proposed noise mitigation plan took place between January and February 2018.
Figure 2.1
Index of Multiple Deprivation

Shepway District
Thanet District
Canterbury District

Dover District Local Plan

Map Scale @ A4: 1:130,000

District Boundary
IMD decile
0 - 10% (most deprived)
10 - 20%
20 - 30%
30 - 40%
40 - 50%
50 - 60%
60 - 70%
70 - 80%
80 - 90%
90 - 100% (least deprived)

Source: LUC, DDC, NE

© Natural England copyright 2018. Contains Ordnance Survey data © Crown copyright and database right 2018
Figure 2.2
Services and Facilities

District Boundary
Open Space
Hospital
GP Practice
Dentist

Schools
Primary
Secondary
Other

Source: LUC, DDC, NE

Map Scale @ A4: 1:130,000

© Natural England copyright 2018. Contains Ordnance Survey data © Crown copyright and database right 2018
Sustainability issues and likely evolution of the issues without the Local Plan

2.49 Analysis of the baseline information has enabled a number of key sustainability issues facing Dover to be identified. They are as follows:

- Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities (see SA objective 1).
- There is a need for affordable housing across Dover. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery (see SA objective 1).
- There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to-date Local Plan, the required housing is less likely to be delivered (see SA objective 1).
- There is a need to reduce the gap between those living in the 10% most deprived areas of Dover (Dover Town) and those living in the least deprived areas of Dover. Dover District contains deprivation ‘hot spots’ that are geographically close to some of the least deprived parts of the country. The Local Plan presents an opportunity to address this through the planning of new and improved communities and infrastructure (see SA objective 2).
- Levels of obesity in the District exceed the national average. The Local Plan can tackle the health of its residents more generally in an integrated fashion by providing for, or encouraging access to, healthcare facilities and opportunities to exercise and travel on foot and by bicycle (see SA objective 2).
- The quality of the District’s green and open spaces can be improved. The Local Plan will help to ensure that the accessibility and quality of local green spaces (new and existing) are planned alongside new development in the District (see SA objective 2).
- There are currently capacity issues within Dover and Deal’s existing primary schools. As the population of the District continues to rise, the District’s existing local services, facilities and infrastructure will be required to expand to meet local needs. The Local Plan provides a means to embed this thinking in the locations for new development (see SA objective 2).

SA objectives

Table 2.1: Population growth, health and well being SA objectives and questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.</td>
<td>SA 1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period? SA 1.2: Does the Plan allocate small, medium to large scale sites to deliver homes in the short, medium and long term? SA 1.3: Do the Plan’s allocations safeguard and enhance the identity of the District’s existing communities and settlements?</td>
<td>Population, Human Health and Material Assets</td>
</tr>
<tr>
<td>SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing,</td>
<td>SA 2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all, including those set out in the Kent and Medway Growth and Infrastructure Framework (GIF)? SA 2.2: Does the Plan promote health and wellbeing?</td>
<td>Population, Human Health and Material Assets</td>
</tr>
<tr>
<td>SA Objectives</td>
<td>Supporting Appraisal Questions</td>
<td>Relevant SEA Topics</td>
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<td>recreation and integration.</td>
<td>wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, recreation and sports facilities, including those set out in the Dover District Sport and Recreation Strategy? SA 2.3: Does the Plan protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with poor air quality, noise, vibration and odour?</td>
<td></td>
</tr>
</tbody>
</table>
3 Economy

Policy Context

International

3.1 There are no specific international or European economic policy agreements relevant to the preparation of the Local Plan and the SA, although there is a large number of trading agreements, regulations and standards that set down the basis of trade within the EU and with other nations.

National

3.2 National Planning Policy Framework (NPPF)\(^{46}\) contains the following:

- The economic role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- Local planning authorities should retain and enhance existing markets and, where appropriate, plan positively for the expansion of emerging sectors, ensuring that markets remain attractive and competitive.
- Competitive town centre environments are prioritised over edge of town developments, which should only be considered where they have good access and do not compromise the viability of town centres in the long term.
- Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well designed new buildings.
- The NPPF requires Local Plans to set out a clear economic vision and strategy that positively and proactively encourages sustainable economic growth, supports existing and emerging sectors, prioritises economic regeneration, facilitates flexible working practices, supports the rural economy and provides the flexibility to adapt to future trends in economic needs where necessary.

3.3 National Planning Practice Guidance (NPPG)\(^{47}\): Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

3.4 The Local Growth White Paper (2010)\(^{48}\): Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

3.5 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)\(^{49}\): Sets out the Government’s Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.

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\(^{47}\) Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance


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

Sub-National

3.6 Lighting the way to success: The EKLSP Sustainable Community Strategy: The document sets out the clear, long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030:
• East Kent will have a thriving and diverse local economy, well adapted to the needs and character of the area.
• East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-targeted housing supply, and connections to London, the South East and Europe.
• There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.
• East Kent will be reaping the benefit of an expanded transport network. Benefits will include greater mobility for businesses and wider opportunities for employment.
• The revival of East Kent’s coastal resorts and the integrated marketing of its attractions will have boosted visitor numbers, average expenditure and length of stay, supporting an additional 10,200 jobs in the tourist economy.

3.7 East Kent Local Investment Plan 2011-2026: Outlines the scale and focus of investment and support required to deliver a programme of projects that will deliver the East Kent Sustainable Communities Strategy’s vision and priorities. Economic prosperity and job creation is at the heart of the East Kent vision. This will include rebalancing the economy through nurturing both new investment and existing businesses and by making sure innovation and enterprise go hand in hand. East Kent Partners have identified 8 strategic spatial priorities, 3 of which are relevant to Dover District:
• Dover Port, Waterfront and Town Centre:
  o Expansion of Dover Port: To consolidate position as global gateway for movement of passengers and freight.
  o Dover Waterfront: A 12.2 hectare brownfield, mixed use development including hotel, restaurants, offices, retail and a minimum of 300 new residential homes with potential for up to 800. Potential for 90-240 affordable homes.
  o Mid Town: A 5.9 hectare brownfield, mixed use development comprising residential, retail, restaurants, education. At least 100 new homes with potential for at least 30 affordable homes.

St James: A 3.2 hectare brownfield, mixed use town centre physical regeneration site. Development will include a supermarket anchor store, retail residential, hotel and leisure facilities.

Public transport improvements: To address challenges associated with the expansion of Dover, the splitting of port traffic along the A2 Corridor for the Eastern Docks and A20 for the Western Docks, and providing sustainable transport solutions to the planned expansion at Whitfield. A central theme here will be to ensure effective integration with Dover Train Station and the High Speed 1 service.

- A2 Corridor:
  - Improvements include dualling of the A2 between Lydden and Whitfield to facilitate housing growth and the longer term strategic aim of separating HGV demand at the Port of Dover via the A2 and A20.

- Whitfield Extension:
  - The core element of Dover’s Growth Point focused around a 309 hectare site capable of providing up to 5,750 new homes (including a proportion of affordable homes) supported by a range of infrastructure and community facilities.

**Current baseline**

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

3.9 Employment floorspace within the District is dominated by industrial uses (B2 and B8). Indeed Dover District has the second largest stock of industrial space in East Kent. However, Dover has the second smallest stock of offices in East Kent despite office stock increasing significantly in the last 20 years. This has resulted in a requirement for at least 55,000 square metres office floorspace to 2026 (baseline).

3.10 Dover District saw a loss of 4,700 jobs across most sectors between 2006 and 2016. The sectors that showed gains in employment were education, hospitality and recreation, finance and insurance, and information and communication.

3.11 Since the 2001 Census the number of part-time employees in Dover District has increased by 27.5%, and the number of full-time employees has risen by 2%. The number of self-employed residents in Dover District has increased by 33.5%. This pattern is similar to that recorded regionally (a 23.1% increase in part-time employees between 2001 and 2011, compared to a 1.8% rise in full-time employees and a 25.1% increase in those self-employed) and nationally (a 27.1% increase in part-time employees between 2001 and 2011, compared to a 3.6% rise in full-time employees and a 28.4% increase in those self-employed).

3.12 The latest data from NOMIS indicates that the District provides 40,000 jobs which equates to a job density of 0.59, which is significantly below the average for Kent (0.78). As such, there is now a growing economic divide between the District and the County as a whole. Since January 2013 the unemployment level in Dover District has been consistently higher than the level recorded nationally (1.2%) and the average for the South-East region (1.9%).

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

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

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

3.16 The Kent Environment Strategy sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the sustained austerity on public sector finances and the need to work more efficiently. This means identifying opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible to deliver priorities.

3.17 Uncertainty exists over what the economic impacts of Britain’s exit from the EU in 2019. However, there is general consensus that the immediate impact will be negative.

Sustainability issues and likely evolution of the issues without the Local Plan

3.18 Key sustainability issues facing Dover are as follows:

- Job density in Dover District will continue to lag behind other Kent districts without coordinated action in the Local Plan to promote regeneration of its town centres, improve the prosperity of the rural economy and the provision of appropriate employment space, specifically B2 and B8 uses (see SA objective 3).
- The Local Plan Review offers an opportunity to capitalise on the regional investment in the A2 Corridor and Dover Port, Waterfront and Town Centre by diversifying and expanding the District’s employment areas industrially and geographically to provide equality of access and opportunity (see SA objective 3).
- Uncertainty exists over what the economic impacts of Britain’s exit from the EU in 2019. The Local Plan Review will need to offer sufficient flexibility to respond to these uncertainties (see SA objective 3).

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## SA objectives

### Table 3.1: Economy SA objectives and appraisal questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
</table>
| SA 3: To deliver and maintain sustainable and diverse employment opportunities. | SA 3.1: Does the District have an adequate supply of land and infrastructure to meet the District’s forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?  
SA3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?  
SA 3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?  
SA 3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District’s town centres and tourist attractions?  
SA 3.5: Does the Plan support the prosperity and diversification of the District’s rural economy?  
SA 3.6: Does the District have sufficient education facilities to help provide the working population the District’s existing and future employer needs? | Population, Human Health and Material Assets                                                                                                                                             |
4 Transport Connections and Travel Habits

Policy Context

International

4.1 The Trans-European Networks (TEN): Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

National

4.2 National Planning Policy Framework (NPPF)\(^6^1\): Encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that generate significant movement are required to be located where travel can be minimised and sustainable transport modes maximised.

4.3 National Planning Practice Guidance (NPPG)\(^6^2\): Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

4.4 Door to Door: A strategy for improving sustainable transport integration\(^6^3\): Focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

4.5 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Sub-National

4.6 Lighting the way to success: The EKLSP Sustainable Community Strategy\(^6^4\): The document sets out the clear, long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030:

- East Kent will be reaping the benefit of an expanded transport network which closely integrates its unique rail, air, sea and road connections. Benefits will include reduced congestion and less environmental damage.

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• Imbalances in the health and life expectancy of East Kent’s citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and anti-social behaviour; poor quality, bad managed housing will have been upgraded.

4.7 **Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031**: Sets out Kent County Council’s Strategy and Implementation Plans for local transport investment for the period 2011-31. Transport priorities for Dover include the following:

- Dover Western Docks Revival.
- Expansion of car park at Dover Priory Station.
- Dover waterfront link to town centre, including a bridge over the A2.
- A260 upgrade.
- A2 Lydden to Dover improvements.
- Projects to facilitate the Whitfield development (including a Park & Ride and Bus Rapid Transit).
- Improvements to Sandwich Station.
- North Deal A258 Eastern Connecting Road.
- North Deal transport improvements.
- Deal improvements and alternative access routes to complement the A258 corridor.
- Improvements to the A2/A258 Duke of York Roundabout.

4.8 **Kent and Medway Growth and Infrastructure Framework (GIF)**: Sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. Identifies the following capacity issues in Dover District:

- Port activity causes congestion on A20 and A2 corridors.
- Development in the north of Dover dependent upon delivery of public transport connectivity.

4.9 The GIF summarises future infrastructure projects in Dover, including transport developments at Western Docks A20 improvements, A256 new Junction, Duke of York Roundabout and projects to facilitate development at Whitfield.

4.10 **Dover Transport Strategy**: The primary purpose of this study was to support the development of the Core Strategy, which proposes significant growth for Dover during the period up to 2026. The Strategy includes an assessment of existing and future (with Core Strategy development) transport conditions, the identification, prioritisation and costing of transport proposals, consideration of the transport issues associated with the Whitfield Masterplan, the growth of Dover Port and an assessment of Air Quality. Key elements of the Dover Transport Strategy are:

- A strategic and dynamic routing strategy for Port traffic.
- Improved access to Dover Priory Station and CTRL services.
- A car parking strategy to manage the demand for town centre car trips.
- Park & Ride at Whitfield and A20 approach.
- Improved one-way system.
- Bus only Pencester Road.

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- New express bus services (Bus Rapid Transit).
- Coordinated traffic signal control.
- Improved accessibility for pedestrians and cyclists, including major new Townwall Street crossing.
- A strong transport awareness and behavioural change programme.

4.11 The Dover Transport Strategy is in the process of being reviewed as part of the wider Local Plan. As the strategy develops, its findings will be incorporated into the SA.

4.12 Deal Transportation Model: Dover District Council in partnership with Kent County Council and Highways England has commissioned a transport model of the settlement of Deal. The model will be developed by extending the existing Dover Transport Model to cover all the key roads, in and around Deal. The model will include a survey of traffic flows to help identify issues such as ‘pinch points’ and ‘rat running’. This information will help to assess the need for new transport infrastructure including possible improved connectivity between Dover and Deal.

4.13 Active Travel Strategy\(^{68}\): Promotes active travel and sets out how the existing walking and cycling network will be maximised. The overarching ambition of the strategy is to make active travel an attractive and realistic choice for short journeys in Kent by planning for it. Delivering on this ambition will lead to improved health through an increase in physical activity; reduced congestion on the highway network by providing better travel choices; and safer active travel.

Current baseline

Road network and congestion hotspots

4.14 Kent is currently facing increased congestion, on both road and rail. Major routes such as the M20/A20, M2/A2 and A21 form important local and strategic links. However, when these are congested it results in delay on the local network, and can have an impact on the wider strategic network also\(^{69}\).

4.15 The Kent Environment Strategy\(^{70}\) sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the increased congestion on both road and rail, impacting Kent’s economy, health and environment. Major routes such as the M20 and A2/M2 form important local and strategic links for residents and businesses that when congested result in delay on the wider local network.

4.16 Port traffic is currently routed along the M20/A20, which results in severance between Dover town centre and the harbour, and is associated with air quality concerns owing to its use by heavy goods vehicles before and after the Channel crossing. With the construction of a new Lower Thames Crossing, a second strategic route will be available between Dover and the Midlands and North.

4.17 The Dover Western Docks Revival Project aims to create a transformed waterfront with a new marina pier and curve to attract a host of shops, bars, cafés and restaurants within Dover’s unique backdrop of the harbour, cliffs and castle. The project will also involve the relocation and further development of Dover’s cargo business with a new cargo terminal and distribution centre.

4.18 Dover Harbour Board is currently carrying out a number of enabling works associated with the Terminal 2 development, approved under the Harbour Revision Order 2012 granted by the Secretary of State at Western Docks. The current works fall short of delivering the full Terminal 2 Scheme, but proposes an interim development to meet current port operational and regeneration objectives.

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\(^{68}\) Kent County Council (2016) Active Travel Strategy [online] Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf


4.19 Port related traffic has a major influence on the town of Dover and the East Kent District as a whole, including the strong seasonal fluctuations in traffic flows during the holiday periods. The A2 approaching the town is of an inferior quality to the rest of the route with sections of single carriageway between Lydden and the Port of Dover. Consequently there is a pressing need for dualling of the remaining sections of single carriageway on the A2 and improvements to the Duke of York’s Roundabout and the Whitfield Roundabout. Outside of the District, congestion at Junction 7 of the M2 (Brenley Corner) also affects the area71.

4.20 Following Brexit, uncertainty exists over customs and immigration checks at the Port of Dover and what effect this will have on traffic flow in and out of the area, specifically congestion caused by HGVs transporting goods. An increase in the amount of time it takes to process customs paperwork could result in longer queues, stretching back to Ashford or even further.

**Rail network**

4.21 Kent’s rail network is divided between the High Speed line that runs from London to continental Europe via Ebbsfleet and Ashford, and the mainline. Recent investment such as the High Speed Rail service has improved access along its corridor to London but further investment is required on the whole network to increase service capacity72. Indeed the Growth and Infrastructure Framework73 states that 17% of all new commuting trips across Kent will be destined for London, a large proportion of which will be by rail. The High Speed rail services from Dover to St Pancras have significantly reduced journey times to London, making the journey more attractive to commuters in particular. However, Dover District Council is pressing for a journey time of less than 1 hour between the two stations, additional capacity on the High Speed route, and investigation into a new Whitfield Station74.

**Bus network**

4.22 There is an extensive bus network delivered on a largely commercial basis by a combination of national operators and local companies. Bus services in Dover serve the town and connect to surrounding towns including Canterbury, Deal, Sandwich and Folkestone. Kent’s ageing population is increasingly reliant on bus services in particular, as are younger people and those without access to a car75. Specific areas of Dover with particularly low levels of car ownership and higher levels of unemployment are found within the wards of St Radigunda, Buckland, Town and Pier, Castle and Tower Hamlets76.

4.23 Dover District Council has been awarded £15.8m from the Government’s Housing Infrastructure Fund to support the development of a Bus Rapid Transit System (BRT) between Whitfield, Dover Town Centre and Dover Priory railway station. The development of the Bus Rapid Transit System is designed to take traffic off key local roads and to connect with the growing business community on the White Cliffs Business Park.

4.24 The BRT includes bridge over the A2 for bus, pedestrian and cycle access, dedicated bus link through White Cliffs Business Park (to Dover Road), widening of Dover Road and a new junction onto Castle Hill Road, Junction Improvements at Castle Hill Road and potential future development of a Public Transport Hub in York Street, Dover.

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Cycle network

4.25 According to the Dover District Cycling Plan, the road network is under ever increasing pressure particularly in urban areas (approximately 25% of all car journeys are less than 2 miles). As such, there is considerable scope for people to switch to using the bicycle to make journeys, particularly in Deal and Sandwich where there is relatively flat terrain. However, there are physical and geographical barriers in Dover that need to be addressed and overcome. At present, there are two National Cycle Routes and three Regional Routes which either begin or pass through the Dover District.

4.26 Figure 4.1 illustrates the transport links across the District.

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Figure 4.1
Transport Links

Source: LUC, DDC

Map Scale @ A4: 1:130,000
Sustainability issues and likely evolution of the issues without the Local Plan

4.27 Key sustainability issues facing Dover are as follows:

- Port-related congestion along the M20/A20, M2/A2 and A21 is resulting in seasonal delays on the local network, which has implications for the wider strategic network. It is also associated with poor air quality. Housing and employment growth have the potential to exacerbate this congestion and the associated air, noise and light pollution it generates (see SA objective 4).

- Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people’s access to services, facilities and employment (see SA objective 4).

4.28 The Local Plan provides an opportunity to update how these issues are addressed over the new plan period, most notably through the promotion of sustainable locations for development and the provision of sustainable transport infrastructure, which will reduce car dependence and facilitate more walking and cycling, as well as other public transport links.

SA objectives

Table 4.1: Transport connections and travel habits SA objectives and appraisal questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.</td>
<td>SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complementary mix of land uses? SA 4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks? SA 4.3: Does the Plan facilitate working from home and remote working? SA4.4 Does the Plan help to address road congestion, particularly congestion related to Port activity?</td>
<td>Air, Climatic Factors, Population and Human Health</td>
</tr>
</tbody>
</table>
5 Air, Land and Water Quality

Policy Context

International


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


5.4 European Air Quality Framework Directive (1996) and Air Quality Directive (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

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

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


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

5.9 European Industrial Emission Directive (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

5.10 National Planning Policy Framework (NPPF)\(^{78}\) contains the following:

- The planning system should protect and enhance soils, particularly the best and most versatile agricultural land.

- New and existing development should be prevented from generating and being adversely effected by unacceptable levels of soil, air and water pollution.

- “Despoiled, degraded, derelict, contaminated and unstable land” should be remediated where appropriate.

- The NPPF encourages the reuse of previously developed land, “provided that it is not of high environmental value”.

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“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.”

5.11 **National Planning Practice Guidance (NPPG)**\(^79\): Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development were it has been demonstrated that significant development is required on agricultural land.

5.12 **Waste management plan for England**\(^80\): Provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

5.13 **National Planning Policy for Waste (NPPW)**\(^81\): Key planning objectives are identified within the NPPW, requiring planning authorities to:
- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns
- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

5.14 **Safeguarding our Soils – A Strategy for England**\(^82\): Sets out how England’s soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

5.15 **Water White Paper**\(^83\): Sets out the Government’s vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

5.16 **Water for Life White Paper**\(^84\): Sets out how to build resilience in the water sector. Objectives of the White Paper are to:
- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short and longer term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.

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• Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.

• Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.

• Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

5.17 **The Air Quality Strategy for England, Scotland, Wales and Northern Ireland**\(^85\): Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy’s objectives. The objectives of the Strategy are to:

• Further improve air quality in the UK from today and long term.

• Provide benefits to health quality of life and the environment.

5.18 **Future Water: The Government’s water strategy for England**\(^86\): Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

5.19 **A Green Future: Our 25 Year Plan to Improve the Environment**\(^87\): Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

• Using and managing land sustainably:
  o Embed a ‘net environmental gain’ principle for development, including natural capital benefits to improved and water quality.
  o Protect best agricultural land.
  o Improve soil health, and restore and protect peatlands.

• Recovering nature and enhancing the beauty of landscapes:
  o Respect nature by using our water more sustainably.

• Increasing resource efficiency and reducing pollution and waste:
  o Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

5.20 **UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations**\(^88\): Sets out the Government’s ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra low emission vehicles (ULEVs), a £290 million National Productivity

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Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

Sub-National

5.21 **Kent Environment Strategy**[^89] sets the following targets in relation to the quality of the environment:

- Decrease the number of days of moderate or higher air pollution and the concentration of pollutants (align with the Kent and Medway Air Quality Partnership and national monitoring standards)
- Work to reduce the noise exposure from road, rail and other transport
- Reduce water use from 160 to 140 litres per person per day
- 28 Kent and Medway water bodies will be at good status by 2021.

5.22 **Kent and Medway Growth and Infrastructure Framework (GIF)**[^90]: Sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The document identifies issues with capacity for treating sewage arising from new houses at Whitfield.

5.23 **Kent Minerals and Waste Local Plan 2013-30**[^91]: Describes (1) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent; and (2) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. It also contains a map showing whether the Minerals Safeguarding Areas are located within the District (see Current baseline). The most commonly safeguarded mineral in Dover is Brickearth, found across the District but particularly to the north-west of Deal.

Local

5.24 **Dover Air Quality Action Plan**[^92]: The aim of this Action Plan is to identify how Dover District Council will use its existing powers and work together with other organisations in pursuit of the annual mean Air Quality Objective for nitrogen dioxide (NO₂). Measures are proposed to improve air quality both within the AQMA and throughout the District as a whole. The direct measures proposed for the AQMA are:

- Improved traffic management through junction improvements
- Dualling of the A2 between Lydden and Dover
- Strategic Signage Improvements
- Improvements to Eastern Docks Layout
- New Dover Eastern Docks Exit Road to A20 Townwall Street
- Consideration of the effects of the development of a Port Buffer Zone
- Consideration of the effects of an expansion to the Western Docks
- Transfer of freight from road to rail.

The general measures to improve air quality across the whole District are:

• DDC will encourage Council Travel Plan opportunities and seek to facilitate uptake of sustainable modes of transport.
• DDC will continue to work together with Kent County Council (KCC) to encourage the uptake of Employer and School Travel Plans within the District.
• DDC will continue to work with KCC to improve the facilities for cycling and walking within Dover and encourage greater uptake.
• DDC Environmental Health will continue to work closely with the Planning Department to ensure that air quality is taken into account in the planning process when located in or close to the AQMA or in areas marginally below air quality objectives.
• DDC will continue to work together with developers to improve sustainable transport links serving new developments.
• DDC will develop, through the Kent & Medway Air Quality Partnership, supplementary planning guidance to assist with air quality assessments of development proposals.
• DDC will continue to work together with KCC to improve public transport services and encourage the use of more sustainable transport modes.
• DDC will continue their commitment to local air quality monitoring within the District to ensure a high standard of data is achieved to assess against air quality objectives.
• DDC will make details of the Action Plan measures and annual progress reports available on the website to ensure broad access to the consultation and implementation process.
• DDC will continue to work together with the Kent and Medway Air Quality Partnership on promotional activities to raise the profile of air quality in Dover.
• DDC will continue to work together with the Kent Energy Centre to promote and implement energy efficiency measures in Dover.

5.25 An updated Air Quality Action Plan is being prepared by Dover District Council.

Current baseline

Air Quality

5.26 The Kent Environment Strategy\(^{93}\) highlights Kent’s unique challenge presented by the county’s position between London and the continent. Easterly winds can bring pollution from cross-channel freight and the continent and westerly winds bring pollution from London. There are currently 40 air quality management areas in the county where air pollutants have been known to exceed objectives set by government.

5.27 There are currently two Air Quality Management Areas (AQMAs) declared in the District due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO\(_2\), caused primarily by road traffic emissions. They are:

- A20 AQMA (declared in 2004 and amended in 2007 and 2009)
- High Street/Landwell AQMA (declared in 2007)

5.28 For NO\(_2\) there are three predicted exceedances of the AQS objective at specific receptors, all of which lie within existing AQMAs. As such, there are no new exceedance areas that the Council has not previously identified\(^{94}\).

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The Air Quality Assessment found that there were no exceedances of PM$_{10}$ AQS objective. As such, there is no requirement to declare an AQMA for this pollutant.

The Air Quality Assessment also considered emissions of Nitrogen (as NO$_x$) from road traffic at existing ecological receptor locations. At each of the three sites assessed, there were exceedances of the nitrogen deposition minimum Critical local. However, the Assessment concluded that these exceedances are primarily attributed to the background deposition rate. As such, nutrient nitrogen deposition from the road contribution can therefore be regarded as not significant.

Overall, the Air Quality Assessment concluded that both AQMAs will remain as declared. Figure 5.1 illustrates the location of the air quality management areas in the District.

Land Quality
Agricultural Land Quality

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

The agricultural land in Sandwich is particularly important and recognised by the Agricultural Land Classification as Grade 1, ‘the best and most versatile quality’. However, a significant area of this is at risk of flooding from both fluvial and tidal flooding. As well as good quality agricultural land, there are large areas of managed grassland and forestry within the District. Figure 5.2 illustrates the agricultural land classifications across the District.

Soils and minerals

The north, north-western and eastern sides of Dover District, north of Ash and south-east of Sandwich, are dominated by poor quality, heavy, Marine/Estuarine Alluvium clay, overlain by seasonally wet deep clay soils. The north-east coast of the District, adjacent to Sandwich Flats, comprises bands of Marine/Estuarine Alluvium and Storm Gravel Beach Deposits. Alluvial and peat soils surround the dykes and marshland of Hacklinge, as well as the land adjacent to the Little Stour River, along the north-western section of the District. A small section of peaty soil lies over the Alluvium bed to the west of Sholden, to the east of the District.

Head Brickearth dominates the west of the District around Stourmouth and Preston, overlain with seasonally wet deep loam to clay. Swathes of Thanet beds, Woolwich Beds and Head Brickearth cover the northern central area of the District, west of Sandwich, overlain again with seasonally wet deep loam to clay. Smaller patches of Clay with Flints appear amidst the swathes, adding to the variation with silty soil.

The southern central section of the District, south and west of Deal and north of Dover, encompassing Aylesham, Kingsdown, Nonington and Sheperdswell, supports generally well drained, good quality chalk of varying depths and silty soil. A distinct pattern of narrow strips of dry valley and Nailbourne Deposits, and wider bands of Head, follow a northeast direction north of a band of Clay with Flints at the very south of the site. The band of Clay with Flints supports deep loam to clay soil. Shallow silty soils lie across the Upper Chalk at the very south of the site.

The minerals that are safeguarded across the District are Brickearth, Sub-Alluvial River Terrace Deposits and Storm Beach Gravel. The most commonly safeguarded mineral is Brickearth, found across the District but particularly to the north-west of Deal.
Water Resource

5.38 Dover District is located on the south coast of Kent, bordered by the English Channel for much of its boundary, the Stour Estuary to the north and Shepway District to the south. The District is underlain by chalk, which provides groundwater for public water supply. As a result of the permeable geology, there are few main rivers in the District, other than the River Dour, River Wingham and River Stour100.

5.39 Drinking water is supplied wholly by groundwater sources from the underlying chalk in Kent. Dover is located in the Environment Agency’s Stour Catchment Abstraction Management Strategy, which identifies that all the groundwater sources are over-abstracted.

5.40 The Kent Environment Strategy101 name’s Kent as one of the driest regions in England and Wales. Kent’s household water use is above the national average (154 litres per person per day compared with 141 litres nationally). Kent’s water resources are under continued pressure requiring careful management and planning. Dover falls partly within the Dour Water Resource Zone (Affinity Water) and the Thanet Water Resource Zone (Southern Water), both of which will experience a shortfall in demand up to 2031102.

5.41 Future demand will be greatly affected by the water efficiency of new and existing homes. 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 measures103. Some areas within the Dover District have been classified by the Environment Agency as at Moderate or Serious Water Stress, meaning either the current household demand for water is high as a proportion of the current effective rainfall available to meet that demand; or, the future household demand is likely to be a high proportion of the effective rainfall available to meet that demand104.

5.42 The Water Cycle Study states that growth in the Whitfield area will need to be supported by significant water infrastructure, including a new trunk main, a service reservoir and a booster station105.

Water Quality

5.43 The Water Cycle Study found that while the River Dour catchment has good water quality, the lower reaches of the River Stour have poor water quality, both in recent years and historically106. Kent’s Water for Sustainable Growth Study107 demonstrates that a large proportion of water bodies in Kent are failing to meet the Water Framework Directive objective of ‘Good Status’. This is due to a number of reasons such as pressures ranging from physical modification, to pollution and over-abstraction. The Environment Agency’s River Basin Management Plans108 identify that the pressures are such that aiming to achieve improvement to ‘Good Status’ by 2027 in Kent is unlikely to be possible in many water bodies either due to technical infeasibility or improvement measures being disproportionately costly.

5.44 According to the Water Cycle Study, small increases in wastewater flows are expected across Dover, following development. This is largely due to the expected reduction in both occupancy rates and per capita consumption. However, the capacity of the sewers network potentially poses a constraint as upgrading and extensions of sewers will be required to meet certain development needs, particularly for development at Whitfield. Individual treatment works have

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102 Aecom (2017) Kent Water for Sustainable Growth Study
104 Aecom (2017) Kent Water for Sustainable Growth Study
107 Aecom (2017) Kent Water for Sustainable Growth Study
varying capacities and those serving the main towns where significant growth is planned will see a marginal increase. According to Kent’s Water for Sustainable Growth Study\textsuperscript{109}, one WwTW facility (Eastry) in the Dover District is close to or at risk of exceeding flow headroom with additional growth in excess of planned levels. Additional demand from the commercial sector also has the potential to increase the strain on individual treatment works\textsuperscript{110}.

5.45 Pressures related to the provision of water supply and wastewater treatment are key contributors to the current status and future status of water bodies in Kent. In combination with other pressures, abstractions for public water supply and discharges of wastewater are impacting on key Water Framework Directive supporting elements which are critical to attaining overall Good Status; this includes impact on hydrological regime, biological quality and physico-chemical quality\textsuperscript{111}.

5.46 Source Protection Zones 2 and 3 are located within the District, protecting the District’s rivers and aquifers from pollution. The majority of the zones are concentrated in the southern third of the District, with a significant concentration to the north-west of Dover. Figure 5.1 illustrates the location of the source protection zones in the District.

\textsuperscript{109} Aecom (2017) Kent Water for Sustainable Growth Study
\textsuperscript{111} Aecom (2017) Kent Water for Sustainable Growth Study
Figure 5.1 Air and Water Quality

Source Protection Zones
- Zone I - Inner Protection Zone
- Zone II - Outer Protection Zone
- Zone III - Total Catchment

Source: LUC, DDC, NE
Figure 5.2
Agricultural Land Classification

- District Boundary
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non Agricultural
- Urban

Source: LUC, DDC, NE

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Sustainability issues and likely evolution of the issues without the Local Plan

5.47 Key sustainability issues facing the District are as follows:

- The District contains some of the county’s best and most versatile agricultural land, most notably around Sandwich, as well as many valuable mineral reserves. The Local Plan provides an opportunity to ensure that these natural assets are not lost or compromised by future growth in the District by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile (see SA objective 5).

- The District’s Source Protection Zones are concentrated in the southern third of the District, with a significant concentration of Zones to the north-west of Dover. The Local Plan provides an opportunity to minimise the amount of inappropriate development that takes place within these Source Protection Zones (see SA objective 5).

- There are two Air Quality Management Areas in Dover District, which have been designated because these areas exceed the annual mean Air Quality Strategy objective for nitrogen dioxide caused primarily by road traffic emissions. The Local Plan provides an opportunity to set out measures to mitigate these exceedances without inhibiting the need for the District to grow (see SA objective 6).

- Groundwater sources in Dover District are over-abstracted. Dover falls within the Dour WRZ and Thanet WRZ, both of which will experience a shortfall in demand up to 2031. A Local Plan provides an opportunity to ensure that water efficiency measures are implemented over the plan period (see SA objective 5).

- Water bodies in Dover are failing to meet the Water Framework Directive objective of ‘Good Status’. A Local Plan provides an opportunity to implement plans to improve water quality (see SA objective 5).

- Small increases in wastewater flows are expected across Dover District, following future development. However, the capacity of the sewerage network could pose a threat to meeting these future development needs, particularly in Whitfield. The Local Plan provides an opportunity to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Whitfield area) is put in place (see SA objective 5).

SA objectives

Table 5.1: Air, land and water quality SA objectives and appraisal questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 5: To promote sustainable forms of development that maintain and improve the quality of the District’s natural resources, including minerals, soils and waters.</td>
<td>SA 5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land? SA 5.2: Does the Plan prioritise development of poorer quality agricultural land of the District’s best and most versatile agricultural land? SA 5.3: Does the Plan minimise development in mineral safeguarding areas? SA 5.4: Does the Plan minimise inappropriate development in Source Protection Zones? SA 5.4: Does the Plan minimise water use? SA 5.5: Does the Plan address capacity issues in the District’s wastewater infrastructure, most notably at Whitfield, and safeguard and enhance the quality of the District’s ground, surface and coastal waters?</td>
<td>Soil, Water, Biodiversity, Human Health, Fauna and Flora and Landscape</td>
</tr>
<tr>
<td>SA Objectives</td>
<td>Supporting Appraisal Questions</td>
<td>Relevant SEA Topics</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------</td>
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<td>------------------------------------------------</td>
</tr>
<tr>
<td>SA 5.6: Does the Plan encourage the reuse and sourcing of local materials?</td>
<td>SA 5.7: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</td>
<td>Air, Climatic Factors, and Human Health</td>
</tr>
<tr>
<td>SA 6: To reduce air pollution and ensure air quality continues to improve.</td>
<td>SA 6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?</td>
<td>Air, Climatic Factors, and Human Health</td>
</tr>
</tbody>
</table>
6 Climate Change Adaptation and Mitigation

Policy Context

International

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


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

National

6.4 **National Planning Policy Framework (NPPF)**\(^{112}\) contains the following:

- One of the core planning principles is to support the transition to a low carbon future in a changing climate, by planning for new development in locations and designs that reduce greenhouse gas emissions and energy use.
- Development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe without increasing flood risk elsewhere.
- Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply and demand considerations and green infrastructure.

6.5 **National Planning Practice Guidance (NPPG)**\(^{113}\): Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

6.6 **Climate Change Act 2008**\(^{114}\): Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO\(_2\) emission reductions of at least 26% by 2015, against a 1990 baseline.

6.7 **Flood and Water Management Act (2010)**\(^{115}\): Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

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\(^{113}\) Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance


6.8 **The UK Renewable Energy Strategy**: Sets out the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

6.9 **The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK**: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

6.10 **The National Adaptation Programme: Making the country resilient to a changing climate**: Sets out visions for the following sectors:

- **Built Environment** – “buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change”.

- **Infrastructure** – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.

- **Healthy and resilient communities** – “a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate”.

- **Agriculture and Forestry** – “profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity”.

- **Natural Environment** – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides”.

- **Business** – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”.

- **Local Government** – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate”.

6.11 **Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England**: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.

- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.

- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

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6.12 **A Green Future: Our 25 Year Plan to Improve the Environment**\(^{120}\): Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.

- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

**Sub-National**

6.13 **Kent Environment Strategy**\(^{121}\) sets the following targets in relation to climate change mitigation and adaptation:

- Reduce emissions across the county by 34% by 2020 from a 2012 baseline (2.6% per year)
- More than 15% of energy generated in Kent will be from renewable sources by 2020 from a 2012 baseline
- Reduce the number of properties at risk from flooding

6.14 **Growing the Garden of England: A strategy for environment and economy in Kent**\(^{122}\): Seeks to ensure that a future sustainable community strategy helps to achieve a high quality Kent environment that is low carbon, resilient to climate change, and has a thriving green economy at its heart. The Strategy is organised into three themes and ten priorities:

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

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

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


Utilise the full social and economic potential of a high quality natural and historic environment in Kent.

Conserve and enhance the quality of Kent’s natural and heritage capital.

Ensure that Kent residents have access to the benefits of Kent’s coast, countryside, green space and cultural heritage.

**6.15 River Stour Catchment Flood Management Plan**\(^{123}\): An overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years. The District of Dover falls within five of the nine sub-areas outlined in the Plan but mostly within the 'Isle of Thanet and Rest of Catchment’ sub-area. The following is relevant:

- **Nailbourne and Little Stour**: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.

- **Lower Stour**: Areas of low to moderate flood risk where action is being taken to store water and manage run-off in locations that provide overall flood risk reduction or environmental benefits.

- **Sandwich Bay**: Areas of low to moderate flood risk where flood risk is currently being managed effectively.

- **Dour and Pent**: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.

- **Isle of Thanet and the rest of catchment**: Areas of little or no flood risk.

**Local**

**6.16 Dover Surface Water Management Plan**\(^{124}\): Identifies sustainable responses to manage surface water flooding and sets out an Action Plan for Dover to inform future decision making. These include the following:

- Improve property resistance/resilience for identified properties on Folkestone Road, East Street and Maison Dieu Road.

- Improve property resistance/resilience for additional selected properties on Folkestone Road and in Tower Hamlets (e.g. Tower Hamlets Street and De Burgh Street).

- Improve property resistance/resilience for selected properties on Crabble Avenue and along Coombe Valley Road.

- Improve property resistance for the properties adjacent to the NHS establishment on the south side of London Road by raising kerbs between the junctions of Kearsney Avenue and Alkham Road.

- Attenuate upstream flows in a detention basin in Buckland Valley Sports Ground. Route exceedance flows along Glenfield Road, Brookfield Avenue and Old Park Road. Raise pedestrian crossing at junction of Crabble Hill and Buckland Avenue to direct flow into the River Dour. Improve property resistance/resilience along route as required.

- Route exceedance flows from Frith Road into the River Dour adjacent to Morrison’s supermarket, and route exceedance flows from Maison Dieu Road into (i) the River Dour via Crafford Street and (ii) a pond, wetland or underground storage sited in the existing Maison Dieu Road car park. Improve property resistance/resilience along route as required.

- Fit tide-excluding gates at outlet of Wellington Dock. Manage tide levels in the dock during periods of high river flow to maintain low tide levels and improve conveyance in the Dour Channel.

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• Attenuate upstream flows in a detention basin, pond or wetland as part of redevelopment of Great Farthingloe. Route exceedance flows from Folkestone Road into a pond or wetland sited adjacent to the Government Immigration Buildings off St John’s Road as part of any redevelopment.

• Route exceedance flows along Coombe Valley Road and Lorne Road and into the River Dour, with an off-line detention basin or pond at the Buckland Hospital site as part of site redevelopment. Improve property resistance/resilience along route as required.

• Improve property resistance/resilience for low threshold properties along High Street.

• Increase storage of flows in the River Dour in the existing ponds at Kearsney.

• Improve property resistance/resilience measures for selected properties in the valley between Cowper Road and Common Lane.

• Route exceedance flows down Minnis Lane and into the River Dour on the upstream side of Minnis Lane. Improve property resistance/resilience along route as required.

Current baseline

Climate Change Adaptation

6.17 Changes to the climate will bring new challenges to the District’s built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP09) show that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present\textsuperscript{125}. Specifically:

• Under medium emissions, the increase in winter mean temperature is estimated to be 2.2ºC; it is unlikely to be less than 1.1ºC and is very unlikely to be more than 3.4ºC.

• Under medium emissions, the increase in summer mean temperature is estimated to be 2.8ºC; it is unlikely to be less than 1.3ºC and is very unlikely to be more than 4.6ºC.

6.18 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species.

Flood Risk

6.19 Kent has the highest risk of local flooding of all local authorities in England and surface water flooding is estimated to affect 76,000 properties in Kent, of which approximately 60,000 are residential. Kent is also currently estimated to have approximately 64,000 properties at risk of river and coastal flooding, of which approximately 46,000 are residential\textsuperscript{126}.

6.20 Flood risk to the District is dominated by tidal flooding, although the settlements of Dover and Sandwich have the additional risk of fluvial flooding, from the River Dour and River Stour respectively. In the lower lying areas of the District, groundwater is another primary source of flooding, as a result of the predominant chalk geology. Additionally, much of the coastal plain area is characterised by marshy areas made up of a series of drains, presenting a different type of flood risk\textsuperscript{127}.

6.21 The fluvial topography of the region is characterised by valleys which are typically ‘u-shaped’ with very flat bottoms and steep valley sides. This landscape character has an impact on flooding in the region as the extent is constrained by the steep valley sides, so once the valley bottom is

\textsuperscript{125} UK Climate Projections (2014) ‘Maps & key findings’ [online] Available at: http://ukclimateprojections.metoffice.gov.uk/21708?projection=23833


Dover District Council New Local Plan 52 February 2018
inundated with water, any further increases in flooding generally leads to greater depths rather than an increase in the spatial extent.\textsuperscript{128}

6.22 There is demonstrable history of surface water and groundwater flooding across the urban area of Dover, for example in June 2007 and the winter of 2000/1.

6.23 In addition to Dover's three main towns (Dover, Deal and Sandwich), the settlement of Whitfield also lies outside of the Flood Risk Zone. Figure 6.1 illustrates the location of flood risk zones in the District.

\textit{Tidal flooding}

6.24 The main sources of flooding in the Dover District are the sea and, to a lesser extent the River Dour through Dover and the River Stour through Sandwich. The Dover District coastline is particularly vulnerable to exceptional sea levels arising from a combination of high tides, storm surge, action of exceptional wave heights and the joint impacts of fluvial and tidal levels (particularly through Sandwich on the River Stour).\textsuperscript{129}

6.25 The most severe flooding would be through either a breach in coastal defence structure or through the defence structure overtopping. The area at greatest risk of flooding is north Deal, where the coastal defence structures are at greatest risk of breaching. In addition, the collection of spray-water from waves crashing against the coastal defences in Deal provides a flood risk in itself. Flooding along watercourses in urban areas can, in some cases, be associated with the surcharge of subsurface drainage systems or the blockage of structures (e.g. culverts, outfalls or bridges).\textsuperscript{130}

\textit{Surface water flooding}

6.26 Surface water flooding in Dover could be caused by intense rainfall before it enters the River Dour or sewer network, overland flow resulting from high groundwater levels, exceedance of the capacity of the surface water or combined sewer networks and 'out of bank flow' from open-channel or culverted sections of the River Dour which results from runoff within the urban area.\textsuperscript{131}

6.27 There are some significant natural drainage paths entering the urban area from the surrounding chalk valleys. Although these are typically dry, they could become conduits for surface water flow during intense rainfall and/or when the surrounding chalk hills become saturated or frozen. A number of these flowpaths are down steep roads. The velocity of flow could present a significant hazard.

6.28 The River Dour channel is complex with numerous culverted sections. It is severely constrained and includes potential obstructions to high flows. There are numerous surface water drains discharging into the River Dour which could become 'tide-locked' by high levels in the River Dour.

6.29 Dover District, in partnership with the Environment Agency and Kent County Council have acted to improve Deal sea defences for 1,250 properties reducing the risk of coastal flooding from once in every 20 years to once in every 300 years. This has been achieved through installing a 200m rock revetment and splash wall at Sandown Castle.\textsuperscript{132}

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

\textbf{Climate Change Mitigation}

6.31 The Government publishes data on the CO\textsubscript{2} emissions per capita in each local authority that are deemed to be within the influence of local authorities. Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline (current progress is a

21% reduction since 2005). In the context of planned growth of Kent’s population and housing development, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure Kent meets their targets and benefits from the opportunities for innovation in these sectors. Some 80% of the housing stock that will be used over the next few decades is already in place and so opportunities to retrofit energy technologies and support a change to low carbon lifestyles will be key to supporting residents in reducing costs and improving energy security.133

6.32 The latest available data shows that CO₂ emissions per capita in Dover fell by 28.9% over 2005-2013 although this masks widely different falls in the three broad sectors measures: Industry and Commercial -40.7%, Domestic -14% and Transport -11.8%.

Figure 6.1
Hydrology

Source: LUC, DDC, EA

Map Scale @ A4: 1:130,000

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Sustainability issues and likely evolution of the issues without the Local Plan

6.33 Key sustainability issues facing the District are as follows:

- Hotter, drier summers expected under climate change have the potential for adverse effects on human health. A Local Plan offers another opportunity to update the District’s approach to managing the effects of the changing climatic and associated weather events, particularly in the design of new buildings and green infrastructure (see SA objective 7).

- Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks can be managed effectively through the Local Plan and any associated update to the Council’s Green Infrastructure Strategy (see SA objective 7).

- Flood risk to Dover District is dominated by tidal flooding, particularly to the north of Deal, where the coastal defence structures are at greatest risk of breaching. The expected magnitude and probability of significant fluvial, tidal ground and surface water flooding is increasing in the District due to climate change. The Local Plan offers an opportunity to contribute further to mitigate the potential effects of any coastal flooding and help the District’s communities adapt to the increased likelihood of significant weather events in the future (see SA objective 7).

- The District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings (see SA objective 8).

SA objectives

Table 6.1: Climate change and flood risk SA objectives and appraisal questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
</table>
| SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change. | SA 7.1: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?  
SA 7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure? | Water, Soil, Climatic Factors and Human Health          |
| SA 8: To mitigate climate change by actively reducing greenhouse gas emissions. | SA 8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat?  
SA 8.2: Does the Plan promote and facilitate the use of electric cars and sustainable modes of transport. | Water, Soil, Climatic Factors and Human Health          |
7  Biodiversity

Policy Context

International

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

7.2  European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

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

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

7.5  European Birds Directive (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.


National

7.7  National Planning Policy Framework (NPPF)\textsuperscript{134}: Emphasises the importance of planning for biodiversity at a landscape-scale across local authority boundaries. The NPPF requires local planning authorities to enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity and ecological networks where possible.

7.8  National Planning Practice Guidance (NPPG)\textsuperscript{135}: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

7.9  Natural Environment and Rural Communities Act 2006\textsuperscript{136}: Places a duty on public bodies to conserve biodiversity.

7.10  Biodiversity 2020: A strategy for England's wildlife and ecosystem services\textsuperscript{137}: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning &


\textsuperscript{135} Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: https://www.gov.uk/government/collections/planning-practice-guidance


Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

7.11 **Biodiversity offsetting in England Green Paper**\(^{138}\): Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

7.12 **A Green Future: Our 25 Year Plan to Improve the Environment**\(^{139}\): Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
  - Develop a Nature Recovery Network to protect and re-introduce species that have been lost from the countryside.

- Securing clean, healthy, productive and biologically diverse seas and oceans:
  - Achieve a good environmental status of the UK’s seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.

- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
  - Support and protect international forests and sustainable agriculture.

**Sub-National**

7.13 **Kent Environment Strategy**\(^{140}\) sets the following targets in relation to biodiversity:

- A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable recovery by 2020.
- 60% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable or recovering status by 2020.
- Status of bird and butterfly species in Kent and Medway are quantified.

7.14 **Kent Biodiversity Action Plan**\(^{141}\): 28 Kent Habitat Action Plans. Each Plan denotes the importance of conserving, enhancing and restoring the natural condition of a habitat by working together on projects.

7.15 **A Living Landscape for the South East**\(^{142}\): Sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The documents highlights the following issues:

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\(^{142}\) The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: [http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf](http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf)
• There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide (‘ecosystem services’). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.

• Better access to the natural environment helps improve mental and physical health, and improves quality of life. There is a need to bring wild places to more people, and bring more people into wild places.

• Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.

• Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

7.16 **Green Infrastructure Strategy**: The District Green Infrastructure (GI) Strategy sets out a framework for protecting, managing, enhancing and increasing the District’s GI and for ensuring that the quality of provision is maintained and enhanced in light of the significant housing growth forecast for the District. The GI Strategy concludes that the importance of Kearsney Abbey, Russell Gardens and Bushy Ruff remains an outstanding priority, particularly given its appeal to a wider public. Satisfaction levels with both the number and quality of GI spaces across the District are high. Deal beach and Kearsney Abbey are the most popular locations, followed by St Margaret’s and the White Cliffs. The results indicate that residents primarily use GI assets close to their homes rather than travel across the District. The District is in the process of updating its Green Infrastructure Strategy to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.

7.17 **Securing the value of nature in Kent**: Explains the benefits of harnessing the value of nature to support business and economy, public health and productive and environmental management.

**Current baseline**

**Biodiversity**

7.18 Kent has not met its Biodiversity 2010 targets and with biodiversity continuing to decline, it is likely that Kent will also fail to meet their Biodiversity 2020 targets without targeted interventions. Although there have been real gains for wildlife in some areas, there is still a gradual loss of habitats and species in the county, for example of the Local Wildlife Sites monitored over the past five years, 30% have been damaged and 2% lost. This represents a significant threat to the intrinsic value of Kent’s natural environment and to the economic and social benefit that it provides.

7.19 Associated with the landscape of the District are some important wildlife sites – three terrestrial Special Areas of Conservation (SAC), one Special Protection Area (SPA) and Ramsar site, two National Nature Reserves (NNR) and over fifty Sites of Nature Conservation Interest (SNCI). Two of the three SACs (Sandwich Bay and Dover to Kingsdown Cliffs) are located along the coast, while the other (Lydmen & Temple Ewell Downs) is located in the south west of the District.

7.20 An ongoing visitor disturbance study at the SPA and Ramsar site (Thanet Coast & Sandwich Bay) shows that recreational impacts are having an adverse impact on the species for which the SPA/Ramsar has been designated. The major concern is that of disturbance to over-wintering birds, particularly their ability to feed and, consequently, resulting adverse effects on their

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breeding performance. The Thanet Coast SPA Mitigation Strategy\textsuperscript{147} states that development in Dover may impact Sandwich Bay.

7.21 The Thanet Coast SPA Mitigation Strategy is to be updated in conjunction with the HRA. Monitoring and visitor surveys are currently being undertaken as part of this work.

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

7.23 There are five SSSIs in the District:

- Alkham, Lydden and Swingfield Woods (76.56% favourable condition).
- Dover to Kingsdown Cliffs (61.34% favourable condition).
- Folkestone Warren (60.55% favourable condition).
- Lydden and Temple Ewell Downs (86.10% favourable condition).
- Sandwich Bay to Hacklinge Marshes (50.35% favourable condition).

7.24 The District contains a significant number of BAP Priority Habitats. Pockets of deciduous woodland are scattered throughout the District, in discreet pockets and along field boundaries. The District contains less extensive distributions of good quality, semi-improved grasslands, which are largely concentrated in the southern quarter of the District. Coastal sand dunes, lowland fens and coastal and floodplain grazing marshes are located along Sandwich Bay and within Worth. Ancient woodland can be found on the chalk around Alkham, Swingfield and Lydden (near Dover), which have been designated as SSSIs for wildlife such as lady orchid, green hellebore and the dormouse. Figure 7.1 illustrates the biodiversity and geodiversity designations across the District.

Geodiversity

7.25 Three Regionally Important Geological Sites are located in the District:

- Betteshanger Colliery Tip: This RIGS is at the former Betteshanger Colliery, which was one of the largest collieries in Kent. The colliery opened in 1924-30 and closed in 1989. The tip, located to the north east of the former pit, was composed of carboniferous sedimentary rock. The fossil plant assemblages found indicate areas of forest, river levees and overbank (crevasse) deposition. A rare, large millipede-like anthopod fossil was also found. The tip has now been landscaped to create Fowlmean Country Park, now known as the Betteshanger Sustainable Parks.

- Tilmanstone Colliery Tip: The spoil tip of a colliery that opened in 1906-1913. The tip is composed of carboniferous sedimentary rock. The recording of the rocks and fossils in the spoil heap, now an endangered system in Kent, is important in our understanding of changes in climate and habitat. Fossil plants found at the colliery include clubmosses, horsetails, ferns and gymnosperms.

- Snowdown Colliery Tip: The spoil tip of a colliery that opened in 1909 and closed in 1987. The tip is composed of carboniferous sedimentary rock. A central depression was caused by extraction for construction of the Channel Tunnel. Fossil plants found at the site include arboreal clubmosses, horsetails, ferns, rare cordaites and charcoal. Fossil animals found include arthropods both terrestrial and freshwater.

\textsuperscript{147} Dover District Council (2012) Thanet Coast SPA Mitigation Strategy [online] Available at: https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Thanet-Coast-SPA-Mitigation-Strategy.pdf
Figure 7.1

Biodiversity

Dover District Local Plan

Source: LUC, DDC, NE

Map Scale @ A4: 1:130,000

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Sustainability issues and likely evolution of the issues without the Local Plan

7.26 Key sustainability issues facing Dover District are as follows:

- Dover contains a number of designated biodiversity sites. All of these biodiversity assets, most notably the Thanet Coast & Sandwich Bay SPA and Ramsar Site, could be harmed by inappropriate development. The Local Plan provides an opportunity to evaluate the condition of the District’s habitats and employ measures to ensure that future growth in the District does not adversely affect their current condition but where possible contributes to their improvement and connection (see SA objective 9).

- Green networks for wildlife and natural green spaces need to be set out clearly in the District Local Plan and any associated GI Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate (see SA objective 9).

SA objectives

**Table 7.1: Biodiversity SA objectives and appraisal questions**

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
</table>
| SA 9: To conserve, connect and enhance the District’s wildlife habitats and species. | SA 9.1: Does the Plan avoid adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?  
SA 9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?  
SA 9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations, most notably at Kearsney Abbey, Russell Gardens and Bushy Ruff?  
SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife? | Biodiversity, Flora and Fauna and Landscape.                                                   |
8 Historic Environment

Policy Context

International

8.1 **United Nations (UNESCO) World Heritage Convention (1972):** Promotes cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

8.2 **European Convention for the Protection of the Architectural Heritage of Europe** (1985): Defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

National

8.3 **National Planning Policy Framework (NPPF)**: Core planning principles include:

- Seek to secure high quality design.
- Take account of the different roles and character of different areas.
- Contribute to conserving and enhancing the natural environment.
- Conserve heritage assets in a manner appropriate to their significance.

8.4 The NPPF also requires the protection and enhancement of valued landscapes, giving particular weight to those identified as being of national importance, as well as recognition that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance.

8.5 **National Planning Practice Guidance (NPPG):** Supports the NPPF by requiring that Local plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

8.6 **The Government’s Statement on the Historic Environment for England 2010:** Sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.

8.7 **The Heritage Statement 2017:** Sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

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8.8 **Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8**\(^{152}\): Sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

**Sub-National**

8.9 **The Kent Design Guide**\(^{153}\): Seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others achieve high standards of design and construction by promoting a common approach to the main principles which underlie Local Planning Authorities’ criteria for assessing planning applications. It also seeks to ensure that the best of Kent’s places remain to enrich the environment for future generations. The guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

8.10 **Lighting the way to success: The EKLP Sustainable Community Strategy**\(^{154}\): The document sets out the clear, long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030, development that is needed to support economic and community progress will be designed to best reflect the character, function and scale of its surroundings. The location of significant new developments will be considered across existing local authority boundaries, to ensure that local distinctiveness is properly reflected and needless environmental cost avoided.

**Local**

8.11 **Dover District Heritage Strategy**\(^{155}\): Seeks to ensure that the heritage of the Dover District plays a clear role in shaping any future regeneration, development and management decisions. It is intended that the Strategy provides a strategic and clear approach to dealing with Dover’s heritage and that the document might act as a pilot exemplar for similar schemes elsewhere in the country. The Strategy identifies the following issues that the District’s heritage assets are vulnerable to:

- Natural processes such as coastal erosion, sea level change, change in hydrology and climate change;
- Rural activities such as ploughing and use of machinery, changes in farming regime and leisure use of the countryside;
- The development and maintenance of infrastructure such as utilities, power generation, roads and railways;
- Development of sites including house building, commercial and industrial properties, extraction of minerals, change in landuse, flood and coastal defence works;
- Change through alteration or economic decline and neglect;
- Policy shortcomings, designation thresholds and capacity for monitoring and enforcement;
- Criminal actions such as arson, theft, vandalism and anti-social behaviour.

8.12 To take the strategy forward four broad objectives have been identified:

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\(^{154}\) East Kent Local Strategic Partnership (2009) Lighting the way to success: The EKLP Sustainable Community Strategy [online] Available at: https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The_EKLP_Sustainable_Community_Strategy_Document_Ref_A85.pdf

Dover District’s historic environment and its heritage assets play a proactive role in enabling and informing regeneration activities to secure better outcomes from sustainable growth.

Dover District realises the tourism and visitor potential and economic benefits of its historic environment and heritage assets.

Dover District’s heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance.

Public understanding of, engagement with, access to and enjoyment of Dover District’s historic environment are increased.

**Current baseline**

8.13 The District’s heritage assets play an important role in defining the character of the District and the identity of its settlements. In many cases they reflect the District’s strategic coastal location and particularly in Dover’s case, its military importance as the closest crossing point to continental Europe. This has given rise to a series of fortifications, most notably the Roman Classis Britannica, Dover Castle, Fort Burgoyne, the Western Heights and First and Second World War fortifications. Although Dover Castle is the District’s top attraction, collectively these assets are not used in a way that exploits their full potential.

8.14 The Dover District has a rich heritage with 1,930 Listed Buildings (39 Grade I, 1,781 Grade II and 110 Grade II*), 50 Scheduled Monuments, 57 Conservation Areas and five Registered Parks and Gardens. Two Heritage Coasts in Kent are found either side of the town of Dover.

8.15 The Historic England at Risk Register lists 12 assets at risk, five of which are in ‘Very bad’ condition (London Road, Mongeham Road, Western Heights, St Radegunds Abbey and The Belvedere in Waldershare Park) and three of which display ‘Extensive significant problems’ (ring ditch and enclosure 200yds east of Parsonage Farm, Great Mongeham Anglo-Saxon cemetery and four ring ditches on ridge of Sutton Hill). **Figure 8.1** illustrates the designated heritage assets across the District.
Figure 8.1
Historic Environment

Source: LUC, DDC, HE
Map Scale @ A4: 1:130,000
Sustainability issues and likely evolution of the issues without the Local Plan

8.16 Key sustainability issues facing Dover are as follows:

- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve accessibility and interpretation of it (see SA objective 10).

SA objectives

**Table 8.1: Historic environment SA objectives and appraisal questions**

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District’s historic environment.</td>
<td>SA 10.1: Does the Plan avoid adverse effects on the District’s designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness? SA 10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District’s heritage assets, particularly at risk assets? SA 10.3: Does the Plan promote access to as well as enjoyment and understanding of the local historic environment for the District’s residents and visitors?</td>
<td>Cultural Heritage</td>
</tr>
</tbody>
</table>
9 Landscape

Policy Context

International

9.1 European Landscape Convention (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

9.2 National Planning Policy Framework (NPPF)\(^{156}\): Planning principles include:

- Take account of the different roles and character of different areas.
- Contribute to conserving and enhancing the natural environment.
- The NPPF also requires the protection and enhancement of valued landscapes, giving particular weight to those identified as being of national importance, as well as the natural and historic environments more generally.

9.3 A Green Future: Our 25 Year Plan to Improve the Environment\(^{157}\): Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England’s Natural Character Areas, and monitoring indicators of landscape character and quality.

Sub-National

9.4 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019\(^{158}\): Sets out measures to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised maintained and strengthened well into the future. The Kent Downs AONB unit is in the process of updating the management plan.

9.5 Lighting the way to success: The EKLSP Sustainable Community Strategy\(^{159}\): The document sets out the clear, long-term vision for East Kent, covering the districts of Canterbury, Dover, Shepway and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030, East Kent’s many designated areas of particular landscape interest will be managed more collaboratively, stressing their interdependence and strengthening their capacity to withstand development pressures.


Current baseline

Landform

9.6 The topography within the Dover District relates closely to the underlying geology. Throughout the District, the land gradually rises to the south. The landform is flat to the north, north west and north east of the Site over the Alluvium and deep clay soils. The landform is distinct at the coast with low lying dunes, shingle beaches and chalk cliffs. A Hercynian fault gave rise to the Dour Valley and Lydden scarp.\(^{166}\)

9.7 The landform becomes gently undulating northwest and west of Sandwich across the Head Brick-earth and Thanet and Woolwich Beds.

9.8 As Upper Chalk begins to dominate the rock type around the centre of the study area, with ribbons of Dry Valley and Nailbourne Deposits, a distinct pattern of ridges and valleys start to form. This pattern becomes more defined towards the south of the site as swathes of Head become apparent. This pattern informs the drainage, with a series of dry valleys and river valleys with marshes to the sea.

9.9 The topography becomes most dramatic at the very south of the District, north of Lydden, where the true downland character of steep hills is most obvious.

9.10 The landform of Dover District comprises coastal cliffs and marshes, orchards, arable lands and the rolling chalk downs with numerous ancient woodlands and valleys. It has three character-defining rivers: the Stour, the Wingham and the Dour.\(^{161}\)

9.11 Dover District has an area of 31,982 hectares, with a coastline of 32 kilometres. Predominantly rural, one quarter of the District is the Kent Downs Area of Outstanding Natural Beauty (AONB) while two thirds is Special Landscape Area (SLA). The only two Heritage Coasts in Kent are found either side of the town of Dover to the north east towardsDeal and south west towards Folkestone. An extensive area of locally designated Local Landscape Significance lies in the old Wantsum Channel.\(^{162}\)

Landscape Character

9.12 According to Kent’s Landscape Assessment, four landscape character areas fall within the Dover District, excluding the Kent Downs AONB. These are:

- The Wantsum and Lower Stour Marshes:
  - Flat, open and remote. No settlement on marshland.
  - Reculver Towers and Richborough Fort mark the end of the Wantsum Channel.
  - Regular field pattern fringed with dykes and drainage ditches. Flood defences are characteristic elements.
  - River courses, flooding and waterlogging.
  - Coastal influences-climate, sand dunes and seabirds

- East Kent Horticultural Belt:
  - Enclosed by hedgerows and shelterbelts, medium scale, gradually sloping or flat.
  - Long views from higher ground.
  - Coastal and marsh edges.


- Diverse agriculture with vineyards, soft fruit, orchards and glasshouses.
- Small isolated linear villages.
- Very narrow winding roads following the field and drainage pattern.

- East Kent Arable Belt:
  - Open, rolling landform with large arable fields and well-wooded hilltops.
  - Simple pattern to the landscape.
  - Narrow winding lanes and dispersed settlement.
  - Parkland trees and 18th century estate villages.
  - Pine trees on field boundaries.
  - Disused collieries, and associated colliery.
  - The coast and sea defined.

- The Stour Valley:
  - Flat valley floor, widening towards the river mouth.
  - Long distance views of Canterbury Cathedral.
  - Wetland pasture drained by well vegetated ditches and dykes; small scale, well enclosed field pattern.
  - Marshland, colourful reeds ad grasses, lakes and open water.
  - Rich and diverse habitats.
  - Settlement on river at edge of floodplain and linear settlement surrounding the valley.

9.13 The District is in the process of updating its Landscape Character Assessment to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.

9.14 **Figure 9.1** illustrates the landscape designations across the District.
Figure 9.1
Landscape

Source: LUC, DDC, NE

Map Scale @ A4: 1:130,000

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Sustainability issues and likely evolution of the issues without the Dover Local Plan

9.15 Key sustainability issues facing Dover are as follows:

- The District contains a number of distinct rural landscapes which could be harmed by inappropriate development. The Local Plan offers an opportunity to ensure that designated landscapes (such as the Kent Downs AONB and Special Landscape Area) are protected and enhanced as appropriate and that development outside these designations is sited and designed to take account of the variation in landscape character across the District (see SA objective 11).

SA objectives

Table 9.1: Landscape SA objectives and appraisal questions

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Supporting Appraisal Questions</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District’s settlements, coastline and countryside.</td>
<td>SA 11.1: Does the Plan protect the District’s sensitive and special landscapes, seascapes and townscapes? SA 11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District’s countryside, coastline and settlements?</td>
<td>Landscape, Cultural Heritage, Biodiversity, Flora and Fauna</td>
</tr>
</tbody>
</table>
10 Sustainability Appraisal Framework

10.1 The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

10.2 The District’s latest set of SA objectives, used for the appraisal of its adopted Land Allocations Local Plan (2015) provided a useful starting point for the development of a new set of SA objectives based on the scoping exercise undertaken under each of the subject area chapters.

10.3 The proposed SA framework for the Local Plan is presented in Table 10.1. The SA Framework is supported by a set of draft site assessment criteria which will be used to establish the potential effects generated by development in site options identified for consideration by the District Council. The performance of sites against the site assessment criteria will be used to inform site selection and the subsequent SA of the Council’s preferred spatial strategy and individual site allocations.

10.4 The SA objectives and appraisal questions set out in the SA Framework and the site assessment criteria are all subject to change following feedback collated during consultation of this SA Scoping Report.
**Table 10.1: SA Framework**

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Appraisal questions: will the Plan/option lead to...?</th>
<th>Relevant SEA Topics</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Population Growth, Health and Wellbeing</strong></td>
<td></td>
<td>Population, Human Health and Material Assets</td>
</tr>
</tbody>
</table>
| SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home. | SA 1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period?  
SA 1.2: Does the Plan allocate small, medium to large scale sites to deliver homes in the short, medium and long term?  
SA 1.3: Do the Plan’s allocations safeguard and enhance the identity of the District’s existing communities and settlements? |                                                                                                                                                                                     |
| SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration. | SA 2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all, including those set out in the Kent and Medway Growth and Infrastructure Framework (GIF)?  
SA 2.2: Does the Plan promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, recreation and sports facilities, including those set out in the Dover District Sport and Recreation Strategy?  
SA 2.3: Does the Plan protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with poor air quality, noise, vibration and odour? | Population, Human Health and Material Assets                                                                 |
| **Economy**                                                                  |                                                                                                                                                                                                                                                     | Population, Human Health and Material Assets                                                                 |
| SA 3: To deliver and maintain sustainable and diverse employment opportunities. | SA 3.1: Does the District have an adequate supply of land and infrastructure to meet the District’s forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?  
SA 3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?  
SA 3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?  
SA 3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District’s town centres and tourist attractions?  
SA 3.5: Does the Plan support the prosperity and diversification of the District’s rural economy?  
SA 3.6: Does the District have sufficient education facilities to help provide the working population the District’s existing and future employer needs? | Population, Human Health and Material Assets                                                                 |
<p>| <strong>Transport Connections and Travel Habits</strong>                                  | SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a                                                                                                                                                               | Air, Climatic Factors,                                                                                      |
| SA 4: To reduce the need to travel                                             |                                                                                                                                                                                                                                                     |                                                                                                             |</p>
<table>
<thead>
<tr>
<th>SA Objective</th>
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</tr>
</thead>
<tbody>
<tr>
<td>and encourage sustainable and active alternatives to road vehicles to reduce congestion.</td>
<td>complimentary mix of land uses? SA 4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks? SA 4.3: Does the Plan facilitate working from home and remote working? SA4.4: Does the Plan help to address road congestion, particularly congestion related to Port activity?</td>
<td>Population and Human Health</td>
</tr>
<tr>
<td><strong>Air, Land and Water Quality</strong></td>
<td></td>
<td></td>
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<tr>
<td>SA 5: To promote sustainable forms of development that maintain and improve the quality of the District’s natural resources, including minerals, soils and waters.</td>
<td>SA 5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land? SA 5.2: Does the Plan prioritise development of poorer quality agricultural land of the District’s best and most versatile agricultural land? SA 5.3: Does the Plan minimise development in mineral safeguarding areas? SA 5.4: Does the Plan minimise inappropriate development in source protection zones? SA 5.4: Does the Plan minimise water use? SA 5.5: Does the Plan address capacity issues in the District’s wastewater infrastructure, most notably at Whitfield, and safeguard and enhance the quality of the District’s ground, surface and coastal waters? SA 5.6: Does the Plan encourage the reuse and sourcing of local materials? SA 5.7: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</td>
<td>Soil, Water, Biodiversity, Human Health, Fauna and Flora and Landscape</td>
</tr>
<tr>
<td>SA 6: To reduce air pollution and ensure air quality continues to improve.</td>
<td>SA 6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?</td>
<td>Air, Climatic Factors, and Human Health</td>
</tr>
<tr>
<td><strong>Climate Change Adaptation and Mitigation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change.</td>
<td>SA 7.1: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? SA 7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure?</td>
<td>Water, Soil, Climatic Factors and Human Health</td>
</tr>
<tr>
<td>SA 8: To mitigate climate change by actively reducing greenhouse gas emissions.</td>
<td>SA 8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat? SA 8.2: Does the Plan promote and facilitate the use of electric cars and sustainable modes of</td>
<td>Water, Soil, Climatic Factors and Human Health</td>
</tr>
<tr>
<td>SA Objective</td>
<td>Appraisal questions: will the Plan/option lead to...?</td>
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<td></td>
<td>transport.</td>
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</tbody>
</table>

**Biodiversity**

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

SA 9.1: Does the Plan avoid adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?

SA 9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?

SA 9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations, most notably at Kearsney Abbey, Russell Gardens and Bushy Ruff?

SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?

**Historic Environment**

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

SA 10.1: Does the Plan avoid adverse effects on the District’s designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness?

SA 10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District’s heritage assets, particularly at risk assets?

SA 10.3: Does the Plan promote access to as well as enjoyment and understanding of the local historic environment for the District’s residents and visitors?

**Cultural Heritage**

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

SA 11.1: Does the Plan protect the District’s sensitive and special landscapes, seascapes and townscapes?

SA 11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District’s countryside, coastline and settlements?
Use of the SA Framework

10.5 The SA will be undertaken in close collaboration with the Dover District Council officers responsible for drafting the Local Plan in order to fully integrate the SA process with the production of the Local Plan.

10.6 A risked based approach to assessment, focusing the detail of assessment on those policies and sites most likely to result in significant effects, will be adopted.

10.7 The findings of the SA of the policy and proposals options for inclusion within the Local Plan will be presented in SA commentary, which will include a colour coded symbol showing score for the option against each of the SA objectives along with a concise justification for the score given where appropriate. Amended and new strategic and development management policies will be grouped by theme and appraised together. More detailed SA analysis will be generated for policies and proposals likely to generate significant effects, such as large site allocation options or sensitive sites. These will be presented as an appendix to the full SA report.

10.8 The use of colour coding in the matrices will allow for likely significant effects (both positive and negative) to be easily identified, as shown in below.

<table>
<thead>
<tr>
<th>Scoring</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>++</td>
<td>Significant positive effect likely</td>
</tr>
<tr>
<td>+/+-</td>
<td>Mixed significant positive and minor negative effects likely</td>
</tr>
<tr>
<td>+</td>
<td>Minor positive effect likely</td>
</tr>
<tr>
<td>+/-</td>
<td>Mixed minor effects likely</td>
</tr>
<tr>
<td>-</td>
<td>Minor negative effect likely</td>
</tr>
<tr>
<td>--/+</td>
<td>Mixed significant negative and minor positive effects likely</td>
</tr>
<tr>
<td>--</td>
<td>Significant negative effect likely</td>
</tr>
<tr>
<td>0</td>
<td>Negligible effect likely</td>
</tr>
<tr>
<td>?</td>
<td>Likely effect uncertain</td>
</tr>
</tbody>
</table>

10.9 The dividing line between sustainability scores is often quite small. Where we distinguish significant effects from more minor effects this is because, in our judgement, the effect of the option on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.

10.10 In determining the significance of the effects of the options for potential inclusion in the Local Plan it will be important to bear in mind its relationship with the other documents in the planning system such as the NPPF, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Reasonable alternatives

10.11 The SA must appraise not only the preferred options for inclusion in the Local Plan but ‘reasonable alternatives’ to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. There is no requirement in the SEA Regulations for all possible reasonable alternatives to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the Plan area are unlikely to be reasonable.
10.12 The objectives, policies and site allocations proposed for inclusion within the Local Plan are in the process of being defined. The Council’s reasons for selecting the alternatives to be included in the Local Plan will be reported at a later stage in the SA process.

**Site assessment criteria**

10.13 The site assessment criteria will be used to establish the potential effects generated by development in site options identified for consideration by the District Council. The performance of sites against the site assessment criteria will be used to inform site selection and the subsequent SA of the Council’s preferred spatial strategy and individual site allocations.

10.14 The draft site assessment criteria are organised under two broad categories:

- Criteria assessing the acceptability of access to the District’s existing services and facilities.
- Criteria assessing the likelihood of harm to the District’s environmental assets and constraints.

10.15 **Appendix 1** sets out the detailed assumptions used to judge the accessibility of access or likelihood of environmental harm for each housing and employment development option against each site assessment criterion\(^{164}\). The proximity of development site locations to services and facilities and environmental assets and constraints is measured in a straight line from the nearest portion of the boundary of each site option.

10.16 The scores achieved by site options against the site assessment criteria indicate whether development in a specific location would be consistent with related sustainability objectives; they do not indicate the significance of the Local Plan’s effects against each SA objective. For example, scores assigned to individual site options on the basis of intersection with areas of environmental constraint such as flood zones or areas of ecological value are independent of the proportion of the site intersecting with the constrained area; as such the assessment scores are designed to highlight potential adverse effects and flag these for closer examination through the Council’s parallel site assessment process. Such examination may reveal that only a small proportion of the site overlaps the constrained area so that it may be possible to avoid the potential effect identified by the SA by an appropriate site layout. Where an individual site could give rise to significant effects in its own right, or in combination with other sites under consideration, these will be identified at an early stage in order to consider possible mitigation and to influence decisions by the Council on which sites to include as preferred sites. Once preferred sites are selected, discussion of the significance of the effects of the Local Plan as a whole is informed by analysis of the total area of sites falling within areas of environmental constraint. These findings on significance will be presented in the SA Report, along with a concise justification for the score given where appropriate.

10.17 It should be noted that there is not a one to one relationship between the site assessment criteria and the sustainability objectives; instead, one site assessment criterion may be relevant to the Local Plan’s effects in relation to achievement of a number of sustainability objectives. **Table A1.3** shows the relationship between the site assessment criteria and the SA objectives defined in SA Framework. **Table A1.4** lists the SA issues which are not considered to be sufficiently area-based to be appropriately assessed using GIS-based site assessment criteria, provides justification as to why and describes how site options will be assessed against each of these SA objective during the appraisal of the District Council’s preferred spatial strategy and site allocations.

10.18 The site assessment criteria provide a framework for assessing individual site options on a like for like basis, based on the existing spatial and environmental conditions within and in close proximity to each site and free from consideration as to what services, facilities, infrastructure and associated environmental mitigation and enhancement each site would provide. This ensures that all reasonable site options can be assessed at the same level of detailed before site selection. The application of the site assessment criteria also serve to highlight gaps in existing services, facilities and sustainable transport links.

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\(^{164}\) The assessment tests applied and information sources used have been adjusted to take account of local issues and evidence.
11 Consultation and Next Steps

11.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment agency, Historic England and Natural England) have been sought in relation to the scope and level of detail to be included in the SA Report.

11.2 As outlined within the introduction, the consultees are in particular requested to consider:

- Whether the scope of the SA is appropriate as set out considering the role of the Dover Local Plan to help meet and manage Dover District’s needs.
- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Dover Local Plan.
- Whether the Scoping Report identifies the significant SA issues which the Dover Local Plan can make a significant contribution towards addressing.
- Whether there are any additional SA issues relevant to the Local Plan that should be included.
- Whether the SA framework is appropriate and includes a suitable set of SA objectives and site-based assumptions for assessing the effects of the options included within the Dover Local Plan and reasonable alternatives.

11.3 Comments should be sent to:

Regeneration Delivery
Dover District Council
White Cliffs Business Park
Dover
Kent
CT16 3PJ

regenerationdelivery@dover.gov.uk

11.4 Responses from consultees will be reviewed and appropriate amendments made to the Scoping Report, including the baseline, policy context and SA Framework where necessary.

11.5 The next formal output of the SA process will be at the Draft Plan stage, during which reasonable alternative strategic, site allocation and development management policies will be assessed. The results of this assessment will inform the Dover planning team in their preparation of subsequent iterations of the Local Plan. The SA of the Local Plan will be reported in an SA Report (incorporating the later stages of the SA process) which will be published for public consultation alongside the Draft Local Plan.

LUC
February 2018
Appendix 1
Site Assessment Criteria
Table A1.1: Access to services and facilities – acceptability of walking distance site assessment criteria

<table>
<thead>
<tr>
<th>Site Assessment Criteria</th>
<th>Residential Sites</th>
<th>Employment Sites</th>
<th>Assessment Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Desirable</td>
<td>Acceptable</td>
<td>Preferred maximum</td>
</tr>
<tr>
<td>Proximity to GP surgeries/health centres and dentists</td>
<td>&lt;= 400 m</td>
<td>401-800 m</td>
<td>801-1,200 m</td>
</tr>
<tr>
<td>Proximity to primary or middle schools</td>
<td>&lt;= 400 m</td>
<td>401-800 m</td>
<td>801-1,200 m</td>
</tr>
<tr>
<td>Proximity to secondary schools</td>
<td>&lt;= 500 m</td>
<td>501-1,000 m</td>
<td>1,001-2,000 m</td>
</tr>
<tr>
<td>Proximity to further and higher education facilities</td>
<td>&lt;= 500 m</td>
<td>501-1,000 m</td>
<td>1,001-2,000 m</td>
</tr>
<tr>
<td>Proximity to local centres</td>
<td>&lt;= 200 m</td>
<td>201-400 m</td>
<td>401-800 m</td>
</tr>
<tr>
<td>Proximity to town centres</td>
<td>&lt;= 400 m</td>
<td>401-800 m</td>
<td>801-1,200 m</td>
</tr>
<tr>
<td>Site Assessment Criteria</td>
<td>Residential Sites</td>
<td>Employment Sites</td>
<td>Assessment Notes</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-------------------</td>
<td>-----------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Proximity to railway stations</td>
<td>&lt;= 500 m</td>
<td>501-1,000 m</td>
<td>1001-2,000 m</td>
</tr>
<tr>
<td>Proximity to bus stops</td>
<td>&lt;= 200 m</td>
<td>201-400 m</td>
<td>401-800 m</td>
</tr>
<tr>
<td>Proximity to cycle paths</td>
<td>&lt;= 200 m</td>
<td>201-400 m</td>
<td>401-800 m</td>
</tr>
<tr>
<td>Proximity to open spaces and sports centres</td>
<td>&lt;= 400 m</td>
<td>401-800 m</td>
<td>801-1200 m</td>
</tr>
<tr>
<td>Proximity to public rights of way (PRoW)</td>
<td>&lt;= 200 m</td>
<td>201-400 m</td>
<td>401-800 m</td>
</tr>
<tr>
<td>Proximity to centres of employment</td>
<td>&lt;= 500 m</td>
<td>501-1,000 m</td>
<td>1,001-2,000 m</td>
</tr>
</tbody>
</table>
Access to services and facilities

Access to services and facilities will be assessed on the assumption that residents will travel on foot rather than by vehicle, reflecting national policy objectives to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to increase activity levels and to reduce vehicle emissions. Various pieces of research provide a variety of recommended guidance distances for walking. Those used in the SA are based on ‘desired’, ‘acceptable’ and ‘preferred maximum’ walking distances described in the publication ‘Guidelines for Providing for Journeys on Foot (Institution of Highways and Transport, 2000).

This suggests, for example, an acceptable walking distance of 800 m to most destinations, 1000 m to work or school, and 400 m to town centres. Professional judgement has been used to vary this standard distance in relation to certain services and facilities, for example, the standard distance of 800 m has been used for railway stations but a shorter distance of 400 m has been used for bus stops, reflecting the fact that individuals are likely to be prepared to walk greater distances to larger scale facilities; similarly secondary schools have been assigned a longer walking distance than primary schools reflecting the fact that older children should be capable of walking a longer distance and secondary schools are generally larger institutions with larger catchment areas than primary schools.

Proximity to open spaces, sports centres and public rights of way

Sites within reasonable walking distance of areas of open space, sports centres and public rights of way should support residents in leading more active lifestyles. Walking distances used for open space and sport centres are based on IHT guidelines for ‘other’ destinations. Shorter distances have been used for proximity to PRoW than proximity to open space and sports centres to reflect the fact that people will be walking further once they reach the nearest PRoW access point.

Proximity to sustainable transport links

The proximity of development sites to sustainable transport links will affect the extent to which people are willing and able to make use of non-car based modes of transport for regular travel to places of employment, shops and so on, although the actual use of sustainable transport modes will depend on many factors.

It is assumed that people would generally be willing to travel further to access a railway station than a bus stop.

The proximity of site options to cycle routes is used as an indicator of how likely people are to cycle to or from a development site. While it is recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on a variety of factors that are independent of proximity such as the perceived safety of the road for cyclists and availability of cycle storage facilities at their destination, it is not appropriate to consider such factors at this strategic level of assessment.

Information about the frequency of public transport services is not taken into account in the SA as this is assumed to be too fluid to be a reliable basis of assessment and should also generally be capable of being increased in response to increased demand.

Proximity to employment opportunities

While the location of residential sites will not influence the number of employment opportunities, the proximity of housing to employment opportunities and public transport links can affect people’s ability to access jobs.

Major employment opportunities are located throughout the plan area and neighbouring districts, not only in the areas allocated for employment, but also in the town centres, retail parks, hospitals, and in small scale premises around the towns as well as large scale businesses concentrated at the employment areas. Although there is no guarantee that people will find jobs at the employment areas closest to them, it is considered that provision of homes close to major sources of employment will support people in making shorter journeys to work.
## Table A1.2: Likelihood of harm to environmental assets site assessment criteria

<table>
<thead>
<tr>
<th>Site Assessment Criteria</th>
<th>Residential Sites</th>
<th>Employment Sites</th>
<th>Assessment Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low</td>
<td>Medium</td>
<td>High</td>
</tr>
<tr>
<td>Proximity to heritage assets: allocations within existing settlements</td>
<td>All other sites</td>
<td>101-250 m</td>
<td>&lt;=100 m</td>
</tr>
<tr>
<td></td>
<td>All other sites</td>
<td>501-1,000 m</td>
<td>&lt;500 m</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: internationally or nationally designated wildlife sites - allocations within existing settlements</td>
<td>All other sites</td>
<td>Intersects with ‘residential’ or ‘all planning applications’ IRZ</td>
<td>Intersects with designated site</td>
</tr>
<tr>
<td></td>
<td>All other sites</td>
<td>Intersects with ‘residential’ or ‘all planning applications’ IRZ</td>
<td>Intersects with designated site</td>
</tr>
<tr>
<td>Proximity to locally designated wildlife</td>
<td>All other sites</td>
<td>&lt;=400 m from designated site</td>
<td>Intersects with</td>
</tr>
<tr>
<td>Site Assessment Criteria</td>
<td>Residential Sites</td>
<td>Employment Sites</td>
<td>Assessment Notes</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>--------------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>------------------------------------------------------</td>
</tr>
<tr>
<td>sites and ancient woodland</td>
<td>boundary designated site</td>
<td>boundary designated site</td>
<td>Woodland</td>
</tr>
<tr>
<td>Proximity to wildlife or geological sites: Priority Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat</td>
<td>All other sites Intersects with habitat N/A</td>
<td>All other sites Intersects with habitat N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proximity to locally designated geological site</td>
<td>All other sites Intersects with LGS N/A</td>
<td>All other sites Intersects with LGS N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proximity to designated landscapes: allocations within existing settlements</td>
<td>All other sites Intersects with designated landscape N/A</td>
<td>All other sites Intersects with designated landscape N/A</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proximity to designated landscapes: allocations outside of existing settlements</td>
<td>All other sites &lt;=5 km to designated landscape Intersects with designated landscape</td>
<td>All other sites &lt;=5 km to designated landscape Intersects with designated landscape</td>
<td>Proximity to National Parks, Areas of Outstanding Natural Beauty and any local landscape designations</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Intersection with Source Protection Zones (SPZs)</td>
<td>All other sites Intersects with SPZ2 or 3 Intersects with SPZ1</td>
<td>All other sites Intersects with SPZ2 or 3 Intersects with SPZ1</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Intersection with flood risk areas</td>
<td>All other sites Intersects with Flood Zone 2 Intersects with Flood Zone 3a or 3b</td>
<td>All other sites Intersects with Flood Zone 2 Intersects with Flood Zone 3a or 3b</td>
<td>Note that FZs relate only to river and tidal flooding.</td>
</tr>
<tr>
<td>Site Assessment Criteria</td>
<td>Residential Sites</td>
<td>Employment Sites</td>
<td>Assessment Notes</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------</td>
<td>------------------</td>
<td>------------------</td>
</tr>
</tbody>
</table>
| Exposure to noise pollution from roads and railways | All other sites | Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB | N/A | N/A | N/A | Lnight road: [https://data.gov.uk/dataset/road-noise-Lnight-england-round-21](https://data.gov.uk/dataset/road-noise-Lnight-england-round-21)  
| Proximity to waste sites | All other sites | N/A | <=500 m to anaerobic digestion (AD) facility or <=250 m to waste management facility | N/A | <=500 m to anaerobic digestion (AD) facility or <=250 m to waste management facility |
| Intersection with mineral resources | All other sites | N/A | Intersects with Mineral Safeguarding Area | All other sites | N/A | Intersects with Mineral Safeguarding Area |
| Intersection with agricultural land | All other sites | Intersects with Grade 3 | Intersects with Grade 1 or 2 | All other sites | Intersects with Grade 3 | Intersects with Grade 1 or 2 | N/A |
Proximity to heritage assets

The NPPF states that the 'significance [of a heritage asset] can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset. In all cases, effects from a Local Plan site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.

The proximity tests used in the SA of the Local Plan site allocations are intended to provide a basis for screening for the potential for adverse effects on heritage assets in the absence of a separately commissioned historic environment sensitivity study or similar. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.

Proximity to wildlife sites

Development sites that are close to wildlife sites may have the potential to adversely affect their features of interest, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure and so on. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as actual effects will depend on the particular sensitivities of the interest features of each wildlife site and appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Effects on internationally designated sites are assessed in detail via the HRA of the Local Plan; effects on other wildlife sites will be considered in more detail through the development management process.

For the purposes of the SA and in the absence of separately commissioned evidence, Impact Risk Zones (IRZs) defined by Natural England are used to provide an initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. IRZs define zones around each biodiversity site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Note that all SACs, SPAs, Ramsar sites and NNRs are also designated as SSSIs thus SSSIs are used as a proxy for all these designations in the SA. A zone of influence of 400 m is assumed for all locally designated wildlife sites and ancient woodland, based on professional judgement.

Proximity to designated landscapes

In the absence of a separate study to establish the landscape sensitivity of the area within which the development site falls, assessment is based on proximity to designated landscapes - where development is within or close to designated landscapes, negative effects could result.

Intersection with Source Protection Zones

The effects of new development on water quality will depend on a variety of factors including whether there is capacity at the relevant wastewater treatment works and in the local sewer network to accommodate the new development; these factors are considered in the discussion of the effects of the plan as a whole rather than on a site by site basis.

Source Protection Zones (SPZs) are areas designated to protect groundwater sources used for public drinking water supply. They relate to the risk of contamination of the water source from various activities, this increasing as the distance between the source of contamination and the groundwater abstraction point decreases:

- Zone 1 = Water borne contamination would take 50 days to travel from any point below the water table to the source (abstraction point); this zone has a minimum radius of 50 metres;
• Zone 2 = Water borne contamination would take 400 days to travel from any point below the water table to the source; this zone has a minimum radius of 250 or 500 metres, depending on the size of the abstraction;
• Zone 3 = Defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source.

Intersection with flood risk areas
The effects of new development on exposure to flood risk will depend to some extent on its design, for example whether it incorporates SuDS, which is more appropriately assessed via SA of the development management policies. Where site options are located in areas of high flood risk, it could increase the number of people and assets at risk from flooding. National Planning Practice Guidance identifies which types of land uses are considered to be appropriate in Flood Zones 2, 3a and 3b with residential properties categorised as a ‘more vulnerable use’ that is suitable in Flood Zones 1 and 2 but would require an exception test in Flood Zone 3a, and is unsuitable in Flood Zone 3b.

Likely contribution to road traffic within areas suffering from traffic-related air pollution
Development sites that are within, or directly connected via road, to an Air Quality Management Areas (AQMA) could increase levels of air pollution in those areas as a result of increased vehicle traffic.

Exposure to noise pollution from roads and railways
The World Health Organization’s Night Noise Guidelines for Europe (2009) set guideline values for health protection in terms of the metric set Lnight, outside which is the average annual noise level in the 8-hour period 2300-0700. The guidelines take account of the fact that the noise levels are measured outside but that the receptor (sleeping person) is inside and that most people to sleep with the window partly open. Adverse health effects begin to be observed when Lnight, outside is in the range 40-55 dB and when Lnight, outside is 55 dB or higher, adverse health effects occur frequently and there is a risk of cardiovascular disease. Since the lowest level of Lnight, outside reported in Defra's strategic noise maps is 50.0-54.9 dB the SA assumes a MEDIUM likelihood of harm for residential development in this noise zone and a HIGH likelihood of harm for residential development in 55.0 dB-59.9 and higher noise zones.

The World Health Organization’s Guidelines for Community Noise (1999) set a guideline limit for average daytime noise in dwellings of 35 dB. Unlike the Night Noise Guidelines for Europe (2009) this limit is not based on the outdoor noise levels required to be monitored by Member States under the Environmental Noise Directive although, based on professional judgement, noise levels experienced indoors can be estimated to be, on average, 0 dB lower than outdoor noise levels so this guideline equates to an outdoor value of 45 dB. Serious annoyance in outdoor living areas occurs at outdoor noise levels of 55 dB. Defra's strategic noise maps show LAeq,16, the annual average outdoor noise levels for the 16-hour period 0700-2300, with the lowest reported noise band 55.0-59.9. The SA assumes a MEDIUM likelihood of harm for residential development in this noise zone and a HIGH likelihood of harm for residential development in 60.0 dB-64.9 and higher noise zones.

The World Health Organization’s Night Noise Guidelines for Europe (2009) confirm that more vulnerable groups such as children, the chronically ill or the elderly are more susceptible to adverse effect from night noise. The SA therefore assumes that proposals for developments to serve such groups have a high likelihood of harm in locations where Lnight, outside is 50.0-54.9 dB or LAeq,16 is 55.0-59.9 dB. The SA does not consider exposure to noise pollution from roads and railways in relation to employment development as noise levels experienced by workers will be heavily influenced by the type of work carried to be out on the premises, whether hearing protection is worn by employees, and the design of the building (e.g. offices are more likely than dwellings to be air conditioned and acoustically insulated).

Proximity to waste sites
Correspondence with the Environment Agency in the course of other SA projects indicates that:
• New development within 500 m of an existing Anaerobic Digestion (AD) activity can result in people being exposed to odour and noise emissions. The severity of these impacts will depend on the size of the facility, the way it is operated and managed, the nature of the waste it takes and the prevailing weather conditions. The odour from an AD plant can be particularly offensive, even at low levels.

• New development within 250 m of a waste management facility could result in the community at the proposed development being exposed to odour, noise, dust and pest impacts. The severity of these impacts will depend on the size of the facility, the nature of the waste it takes and prevailing weather conditions.

Intersection with mineral resources
All new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of development sites. However, development within a Mineral Safeguarding Area may sterilise mineral resources. This could leave insufficient resources for future generations or mean that the minerals planning system loses the flexibility to extract resources at sites that would have a lower impact on the environment.

Agricultural land
The effects of new development on soils will depend on its location in relation to the areas of highest quality agricultural land in the Plan area, and whether the land has previously been developed. While prioritisation of brownfield land for development helps to make efficient use of land and soils, reliable and comprehensive data on the greenfield/brownfield status of land within the plan area is not always available, meaning that sites cannot be assessed on a consistent basis against this criterion. Potential loss of agricultural land is assessed by reference to the Agricultural Land Classification (ALC) used by Natural England to give advice to planning authorities and developers. The classification is based on the long term physical limitations of land for agricultural use; factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.

Translating site assessment scores into SA objective effects
The site assessment criteria scores will be reorganised under the agreed SA Framework using Table A1.4 below, i.e. the scores for site assessment criteria with a ‘yes’ against a particular SA objective will be combined to give an overall score for each site by SA objective.

To sum the site assessment scores by SA objective, the ‘colour’ scores will be translated into numerical scores as set out below:

• Accessibility criteria scores (desirability of walking distance):
  o Desirable = 3
  o Acceptable = 2
  o Preferred Maximum = 1
  o Unacceptable = 0

• Environmental criteria scores (likelihood of harm):
  o Low = -1
  o Medium = -2
  o High = -3

Where an individual site could give rise to significant effects in its own right, or in combination with other sites under consideration, these will be identified at an early stage in order to consider possible mitigation and to influence decisions by the Council on which sites to include as preferred sites. Once preferred sites are selected, discussion of the significance of the effects of the Local
Plan as a whole will be informed by the above analysis. These findings on significance will be presented in the SA Report, along with a concise justification for the score given where appropriate.
### Table A1.3: Relationship between site assessment criteria and SA objectives

<table>
<thead>
<tr>
<th>Site Assessment Criteria</th>
<th>Relevant to residential sites?</th>
<th>Relevant to employment sites?</th>
<th>SA1 - Housing</th>
<th>SA2 - Equality, Health and Well Being</th>
<th>SA3 - Employment</th>
<th>SA4 - Transport</th>
<th>SA5 - Efficient Use of Land and Resources</th>
<th>SA6 - Air Pollution</th>
<th>SA7 - Climate Change Adaptation and Flood Risk</th>
<th>SA8 - Climate Change Mitigation</th>
<th>SA9 - Biodiversity</th>
<th>SA10 - Historic Environment</th>
<th>SA11 - Landscape</th>
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#### Access to services and facilities site assessment criteria

- Close proximity to at least one primary or secondary school
- Close proximity to at least one local centre
- Close proximity to at least one town centre
- Close proximity to at least one railway station
- Close proximity to at least one bus stop/tram stop
- Close proximity to cycle paths
- Close proximity to open spaces and sports centres
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<td>Exposure to noise pollution from roads and railways</td>
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### Table A1.4: SA issues not covered by site assessment criteria

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<tr>
<th>SA Issue</th>
<th>Relevant SA Objective</th>
<th>Why SA issue not covered by site assessment criteria</th>
<th>How the issue will be appraised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing provision</td>
<td>1 – To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.</td>
<td>All of residential sites will contribute to meeting housing need but the effects of the Local Plan in relation to this SA objective will not depend on the locations of individual sites but rather on the policies determining the total amounts, types and tenures of houses to be provided and their broad distribution across the plan area.</td>
<td>All site options with the potential to deliver homes within the plan period have the potential for positive effects on SA Objective 1. However, an appraisal of the Plan’s ability to deliver the quantity, quality and range of homes required in the plan period will be included in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan’s site allocations as a whole.</td>
</tr>
<tr>
<td>Reducing crime and fear of crime</td>
<td>2 – To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well being, recreation and integration.</td>
<td>The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site).</td>
<td>The performance of the Local Plan in relation to achieving this objective is assessed via the SA of development management policies rather than SA of site options.</td>
</tr>
<tr>
<td>Employment provision</td>
<td>3 – To deliver and maintain high quality, sustainable and diverse employment opportunities.</td>
<td>All employment sites will contribute to meeting employment need but the effects of the Local Plan in relation to this SA objective will not depend on the locations of individual sites but rather on the policies determining the total projected number and type/range of jobs to be provided and their broad distribution across the plan area. Proximity of residential sites to existing employment sites (i.e. job opportunities is covered in the appraisal of SA objective 2.</td>
<td>All site options with the potential to deliver jobs and employment land within the plan period have the potential for positive effects on SA Objective 3. However, an appraisal of the Plan’s ability to deliver the quantity, quality and range of jobs required in the plan period will be included in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan’s site allocations as a whole.</td>
</tr>
<tr>
<td>Sustainable design and construction</td>
<td>5 – To promote sustainable forms of development that maintain and improve the quality of the District’s natural resources, including minerals, soils and waters.</td>
<td>Specific design and construction methods used and whether renewable energy infrastructure is to be incorporated in the development will not be known until planning applications come forward.</td>
<td>The SA considers the effects of the Local Plan on these factors via assessment of development management policies rather than assessment of site options.</td>
</tr>
<tr>
<td>Prioritising development of brownfield land over greenfield land</td>
<td></td>
<td>The potential adverse environmental effects of loss of greenfield land are covered by other SA objectives. Therefore, avoiding loss of greenfield land is not separately assessed.</td>
<td>The environmental effects of site options are assessed under SA objectives 5, 6, 7, 8, 9 and 10.</td>
</tr>
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<td>Air pollution and the associated health implications</td>
<td>6 – To reduce air pollution and ensure air quality continues to improve.</td>
<td>The proximity of sites to Air Quality Management Areas (AQMAs) does not appropriately test the potential for such sites to generate road traffic through AQMAs. Furthermore, in isolation, individual sites options are likely to relatively minor effects on Air Quality.</td>
<td>It is considered more appropriate to appraise the Plan’s ability to reduce air quality over the Plan Period in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan’s site allocations as a whole.</td>
</tr>
<tr>
<td>SA Issue</td>
<td>Relevant SA Objective</td>
<td>Why SA issue not covered by site assessment criteria</td>
<td>How the issue will be appraised</td>
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<tr>
<td>Climate change mitigation</td>
<td>8 - To mitigate climate change by actively reducing greenhouse gas emissions.</td>
<td>While new development will inevitably lead to an increase in greenhouse gas emissions (both through emissions from buildings and the increased vehicle traffic associated with growth), the location of individual development sites will only affect these in relation to the accessibility of the site to sustainable transport modes and employment areas, services and facilities.</td>
<td>The influence of development design and construction method are assessed via the SA of development management policies.</td>
</tr>
</tbody>
</table>