

**Dover District Council**

**Local Plan Topic Paper: Overarching Strategy**

**(Part 1)**

**June 2019**

## Introduction

### What is the Local Plan?

The Council has a statutory duty to prepare a Local Plan. The Local Plan is a development plan document that sets out the vision and framework for the future development of the Dover District over the next 20 years.

The Government's National Planning Policy Framework (NPPF) provides the high-level context for preparing Local Plans. This is supplemented by the Government's Planning Practice Guidance (PPG) which sets out how to implement the policies in the NPPF. The Council must have full regard to the NPPF and PPG in addition to other national, regional and local plans and strategies when preparing the Local Plan.

The Council is in the early stages of the process of producing a new Local Plan for the District. The Local Plan will replace the existing 'Development Plan' that currently consists of the Adopted Core Strategy (2010), the Land Allocations Local Plan (2015), the saved policies from the 2002 Local Plan and the Worth Neighbourhood Development Plan. The new Local Plan will:

- Set the strategic planning policies of the Council, taking account of key factors like population trends, economic growth, climate change, resources and built and natural environmental character;
- Set the general scale and distribution of new development which is required to meet Dover's needs to 2040;
- Provide the planning principles, including detailed 'development management' policies to guide decisions on planning and other applications;
- Show in detail where new homes, workplaces and facilities will be located through allocations of land; and
- Show key environmental designations and include site specific proposals for the conservation and enhancement of those historic and natural assets.

The currently proposed structure and scope of the new Local Plan is set out in Appendix 1.

Once adopted, the policies in the Local Plan, together with those in existing and proposed neighbourhood plans, will be the starting point for the assessment of all planning applications, unless material considerations indicate otherwise.

### Why do we need to prepare a new Local Plan?

Since the adoption of the Core Strategy in 2010, there have been a number of changes to the planning system, with the abolition of Regional Spatial Strategies (the South East Plan), the publication of the National Planning Policy Framework in 2012, and the recent revisions to the NPPF in 2018 and 2019, meaning that some of the policies in the Council's current Plan are out-of-date (Policies DM2, CP2, CP3) and therefore cannot be relied upon. The Government has introduced the requirement for Councils to review their Plans every five years, to ensure they remain relevant and responsive to changes in the market especially in relation to housing growth.

The Government wants to see every community covered by an up-to-date plan for sustainable development - meaning that communities are in control of development and are not exposed to speculative development. As made clear in the National Planning Policy Framework, the preparation and implementation of these plans is key to achieving sustainable development.

The Planning Inspectorate will publish on a quarterly basis a report that sets out the Local Plans that are expected to be submitted for examination in the following 6-month period. Having an up-to-

date Local Plan is the only way that the Government will meet its target of achieving a minimum of 300,000 homes every year in order to tackle the current housing crisis. It is important to understand that the housing 'need' manifests itself in a variety of ways, such as increased levels of overcrowding, acute affordability issues, more young people living with their parents for longer periods, impaired labour mobility resulting in businesses finding it difficult to recruit and retain staff, and increased levels of homelessness.

In addition to this, under the new planning system, a much stronger emphasis is placed on the Duty to Co-operate, in order to agree strategic matters that cross administrative boundaries; housing delivery, with stringent penalties imposed on Councils that fail to deliver development in the form of the need to prepare a Housing Delivery Action Plan; and local plan viability, to ensure that the Plan and sites allocated within it are deliverable.

It is therefore essential that the District continues to have an up-to-date Plan for the area to address these challenges, and to set out how the Council intends to deliver an increase in housing numbers, whilst also delivering jobs, retail and leisure facilities and open spaces, and balancing this need against a range of environmental and natural constraints. Given this, the decision was taken by the Council's Cabinet in March 2017 to proceed with a new Local Plan for the District.

### **What are the expectations of the Government?**

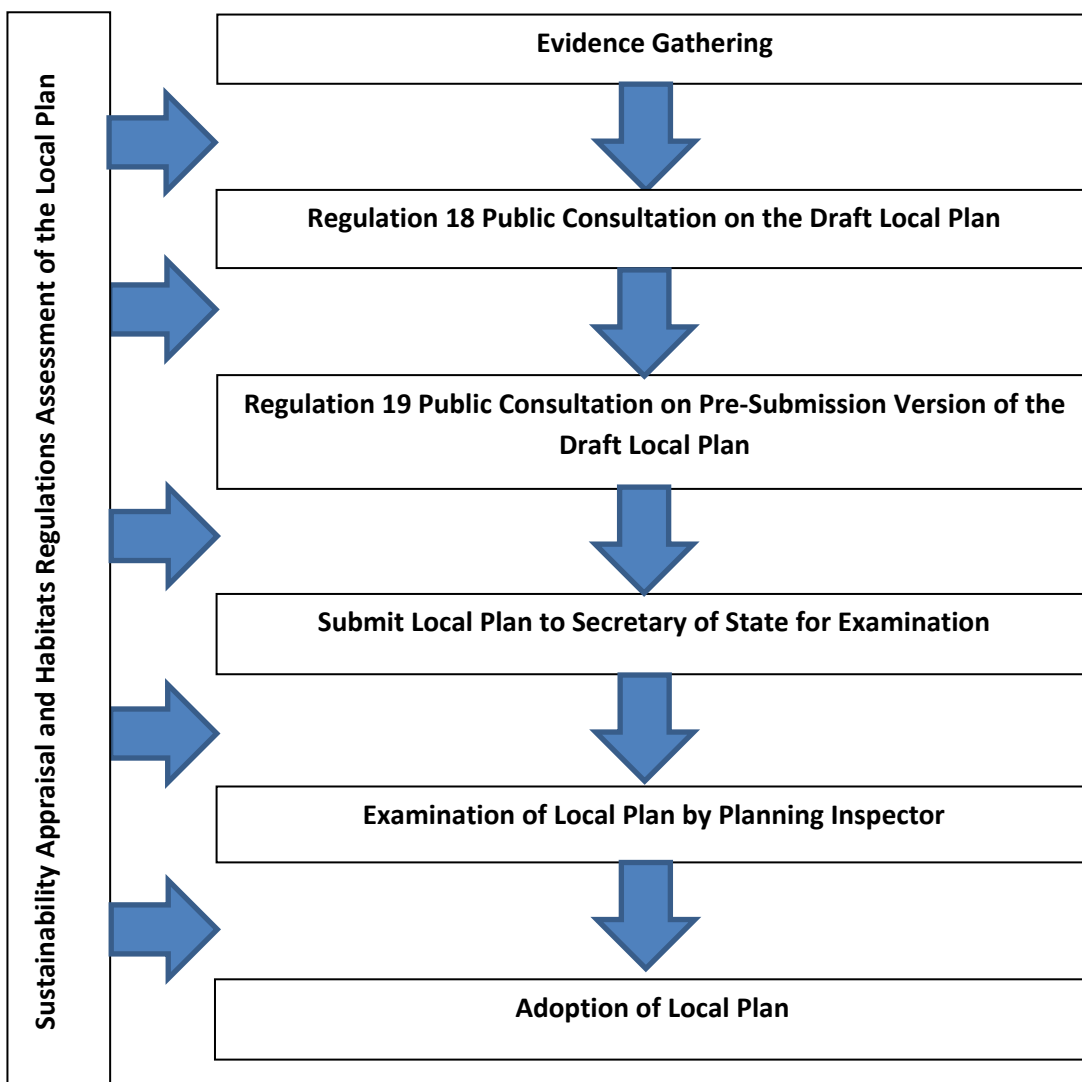
The Government's objectives are set out in the National Planning Policy Framework (NPPF) 2019. The NPPF places Local Plans at the heart of the planning system and makes clear that local authorities should:

- Contribute to the achievement of sustainable development (para.7): There are three key objectives to achieving sustainable development: economic, social and environmental. The policies in the new Local Plan will therefore need to seek opportunities to make a positive contribution to these objectives and ensure that the presumption in favour of sustainable development lies at the heart of the Local Plan.
- Positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para 11): An example of this is that there has been a number of recent high profile shop closures that have either already happened or are due to take place, in the retail and leisure industry which are having a dramatic impact on the future of the high streets combined with the increase in shopping on the internet. This means that allowing town centres to be more flexible and drafting policies in the Local Plan that allow them to respond to changing local circumstances will be a critical issue for their future success.
- Support the Government's objective of significantly boosting the supply of homes (para 59): As a minimum the Government expects Local Authorities to provide for the objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Paragraph 68 of the NPPF is very clear about the role that small and medium sized sites can play in terms of boosting the supply of housing. To this end, there is now a requirement that at least 10% of the Council's housing requirement needs to be on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. It will, therefore, be essential that prior to publishing the draft Local Plan at the Regulation 18 stage, there is a cross check of the sites that have been allocated for development in the Local Plan in order to ensure that the Council meets the requirements of paragraph 68 of the NPPF.
- Deliver a sound Plan that is positively prepared in terms of seeking to meet objectively assessed needs; is justified by the evidence; is deliverable; and consistent with national policy (para. 35)
- Co-operate with other Local Planning Authorities and County Councils (in two tier areas), and with other prescribed bodies, under the duty to co-operate, on strategic matters that cross administrative boundaries (para 24):As part of this, the Government expects strategic policy

making authorities to collaborate to identify the relevant strategic matters which need to be addressed in their Local Plans. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

### What is the Plan Making Process?

The key stages involved in the preparation of the new Local Plan are set out in the diagram below. At present the Council is in the process of gathering evidence to support the Local Plan and the key findings of this work are set out later in this Paper. Following this, the Council will consult on the draft Local Plan (Reg 18) next year.



All consultation on the various stages of the Local Plan will need to be in line with the Council's Adopted Statement of Community Involvement (SCI) <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Statement-of-Community-Involvement.pdf> and the Local Plan engagement strategy <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Local-Plan-Engagement-Strategy.pdf>

[Regeneration/PDF/Local-Plan-Community-Engagement-Strategy.pdf](#) The timetable for the preparation of the Local Plan is set out in the Local Development Scheme <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/Local-Development-Scheme.aspx> and will be updated as the new Local Plan progresses.

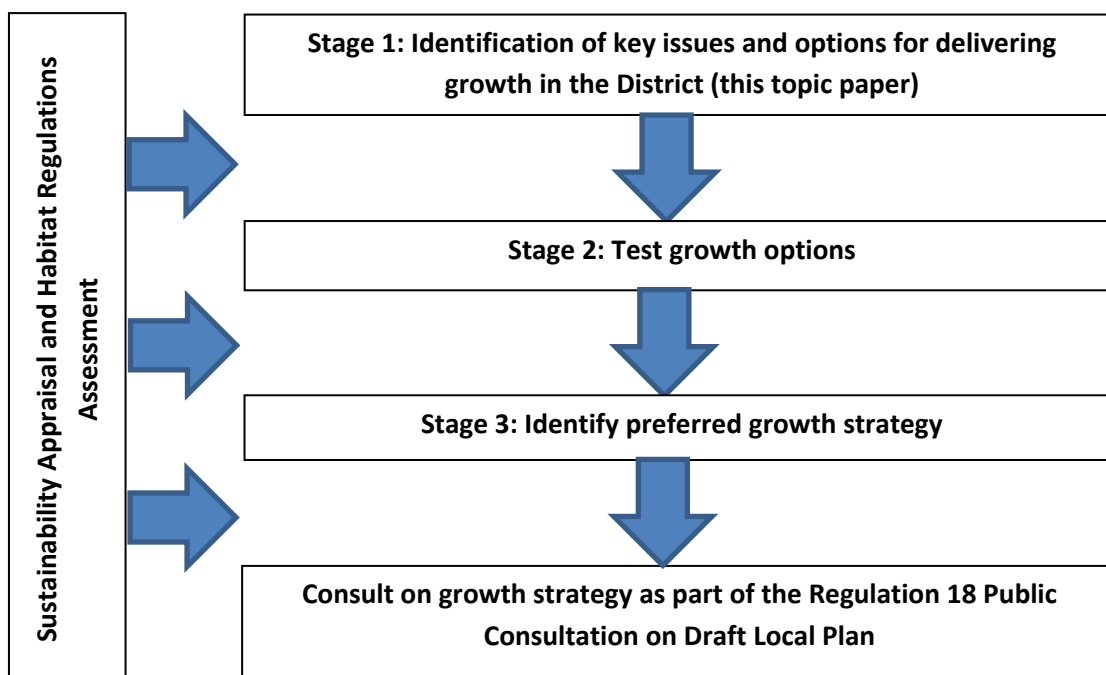
### What is the purpose of this Topic Paper?

A series of topic papers will be produced to support the Local Plan covering issues such as housing, economic growth, transport and infrastructure, and the environment. These topic papers will be developed as part of the plan making process and will form part of evidence base to justify the policy approach set out in the Local Plan. They will then be presented to the Inspector as part of the examination of the Local Plan.

This Paper is the first of these Topic Papers and sets out the considerations for developing an overarching growth strategy to be taken forward in the Local Plan. As part of this the Paper considers:

- What the Council's existing growth strategy is, and how effective the strategy has been;
- What key issues and constraints need to be addressed as part of the overarching growth strategy in the new Local Plan;
- What the key messages were from the Local Plan workshops and how these should inform the overarching growth strategy in the new Local Plan;
- What the new vision and objectives for the Local Plan should be, as this will shape the overarching growth strategy for the District;
- What the alternative options are for delivering growth in the District; and
- How these growth options can be taken forward for testing and a preferred growth option identified that can be taken forward as part of the new Local Plan.

This topic paper will be taken forward in three stages that are outlined in the diagram below. We are currently at stage 1 in the process. Once all three stages of work have been completed, it will then be amalgamated into a single Topic Paper that will be published alongside the draft Local Plan (Regulation 18 stage).



To inform the development of this paper a series of conversations will also commence with Town/Parish Councils and the Policy Advisory Group on a range of Local Plan issues before proceeding to Part 2 and 3 of the work. Owing to the fact that this is iterative process, the outcomes of these conversations will be included in later updates to this Paper.

## Background and Context

### What is the Council's current vision and strategy for the District?

The Corporate Plan 2016 – 2020 is the Council's main strategic document, providing a framework for the delivery of services. It is a clear statement of the Council's vision and priorities and provides the context for other strategies and plans that the Council produces.

The Corporate Plan sets out the Council's overarching vision for the District: to secure a prosperous future for the Dover district, which will be a place where people want to live, work, invest and visit. In addition it identifies the following strategic priorities to achieve the Council's vision:

- Priority One: Thriving Economy. By 2020 the Council wants to see that people in the district benefit from a stronger and more prosperous economy
- Priority Two: Clean, Green and Safe Environment. By 2020 the Council wants to see that the Dover district is a great place to live, work and visit
- Priority Three: Healthier People and Communities. By 2020 the Council wants to see that people in the district are healthier
- Priority Four: Smarter Council. By 2020 the Council wants to see that people in the district are engaged and empowered to achieve their own potential

The new Local Plan will therefore need to have regard to the aims and objectives of the existing Corporate Plan and work hand in hand with the forthcoming revisions to the Corporate Plan, when developing the overarching growth strategy for the District over the next 20 years.

The Council's adopted Core Strategy (2010) and Land Allocations Local Plan (2015) set out the Council's strategy to delivering housing and economic growth in the District over the period to 2026.

Key elements of the existing strategy are to:

- Plan for 14,000 new homes, with the aim of delivering a minimum of 10,100 homes by 2026.
- Deliver up to 6,500 new jobs and 54,000 sqm gross additional retail floorspace across the Plan period to 2026
- Provide a better mix of housing, with the focus on delivering more family housing in the District
- Ensure growth is supported by the relevant infrastructure to ensure the creation of high quality sustainable places
- Protect and enhance existing historical and environmental assets in the District
- Ensure that new development addresses the challenges of climate change

As part of the preparation of the Core Strategy four possible growth options were tested:

- Low growth – 6,100 homes, based on a continuation of trends and the original provision in the then draft Regional Spatial Strategy (RSS)
- Medium Low Growth – 8,100 homes which became a level recommended in the Panel Report to Government
- Medium High Growth – 10,000 homes which is reflected in the minimum requirement set out in the Government's proposed changes to the RSS

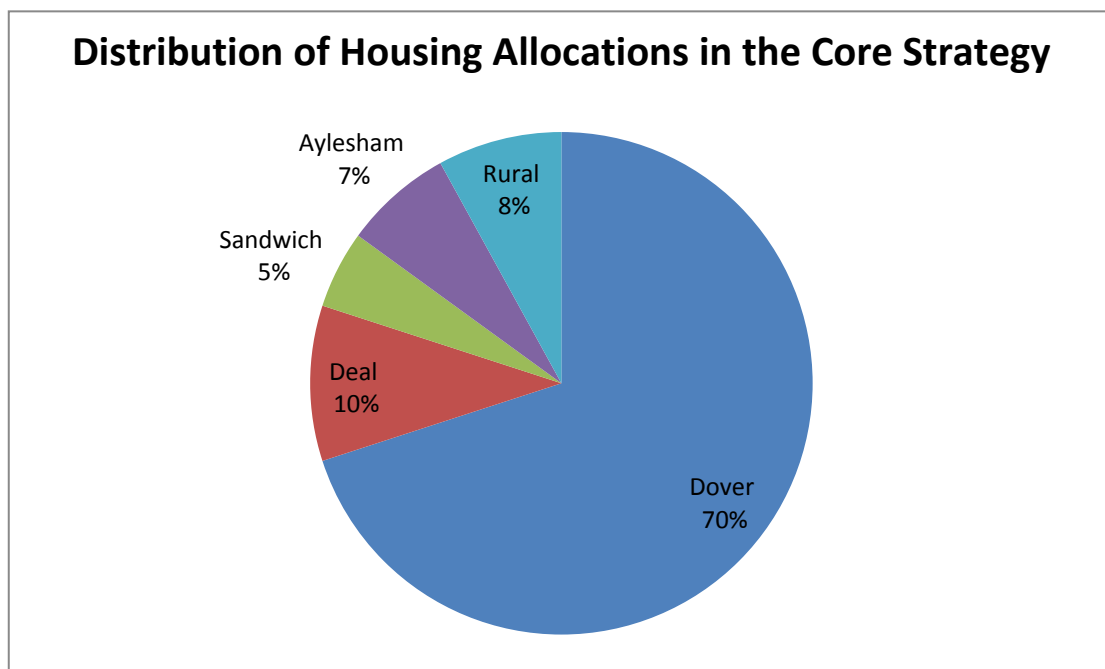
- High Growth – 14,000 homes based around the recommendations of the Dover Regeneration Strategy which was a strategy that set out some ideas about the future of the District

However, the Council concluded that the high growth option was best aligned with their long term aspirations for the District and the independent Inspector’s report on the Core Strategy dated 21<sup>st</sup> January 2010 supported the Council’s position confirming its compliance with the Council’s policy for economic growth.

The Council’s existing growth strategy is centered on delivering the regeneration of Dover, with 70% of the new housing development planned here, the majority of which will be delivered as part of the new urban extension at Whitfield. The secondary focus for housing development is then the District’s smaller centres: Deal and Sandwich, and through the strategic expansion of Aylesham. The remainder of the housing growth is then centered on local centres and villages in the rural area.

This strategy was developed out of the need to focus on delivering change and improvements in Dover, through increasing the scale of population growth, which could only be supported through additional housing, that better reflected the needs of the population. Furthermore, the combined constraints of landscape, access, flood risk and wildlife meant that the growth potential of Deal and Sandwich were limited.

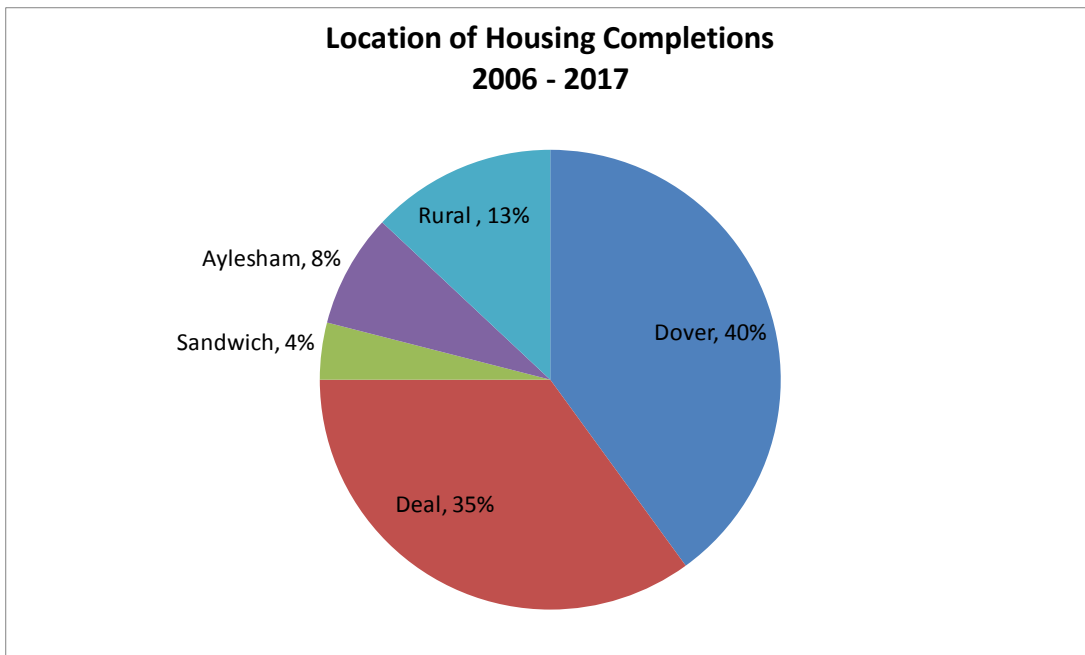
The distribution of current housing allocations in the District is illustrated in the chart below.



It is evident however from the Council’s Authority Monitoring Reports and a review of the Council’s evidence base, that key aspirations set out in the Core Strategy have not been fully realised:

- The overall level of housing delivery in the District to date is below the Core Strategy housing target, with 4,012 homes delivered in the District between 2006/2007 – 2017/2018 when compared to 6,156 homes that should have been built within the same period.





- The level of housing development in Dover has been significantly less than the 70% envisaged in the Core Strategy (40%). This is primarily due to the nature of the sites that were allocated in Dover (i.e. more constrained brownfield sites), low land values and the fact that progress on the delivery of 5,750 new homes at Whitfield has fallen significantly behind schedule due to viability and infrastructure issues.
- The level of housing development in Deal and the rural areas is conversely much higher than envisaged (35%), due to the nature of the sites coming forward i.e. the sites that were allocated for development were less constrained greenfield sites and better values, and have as result of this been largely built out or construction is underway.
- Whilst population growth has occurred in line with the aspirations in the Core Strategy, the working age population of the District is still some way under the Core Strategy target of 72,100 (by 2026)
- There has been negative growth in the economy due in part to the national recession and the contraction of Pfizer which has resulted in the growth targets that are contained in the Core Strategy not being delivered. The Economic Development Needs Assessment is forecasting that there will be +2,700 jobs by 2037 which will not quite get the District back to 2006 levels.
- Employment land has been available for development but the viability of sites has hindered new employment development.
- The target of delivering 54,000sqm new retail floorspace in the District has also not been met (by 2026).

It is clear from this that the existing growth strategy for the District set out in the Core Strategy and Land Allocations Local Plan needs to be reviewed and a fresh approach taken to the delivery of growth across the District. This will be taken forward as part of the testing of the growth options work and ultimately, the Local Plan review.

**What are the key issues that need to be addressed in the Local Plan?**

The NPPF is very clear that evidence will need to be assembled to support and underpin the strategy in the Local Plan. This will be particularly important at the Local Plan Examination stage when an Inspector will ask the question whether the content of the Local Plan is justified by a proportional evidence base. The evidence base should inform the Local Plan rather than being collected retrospectively to justify a particular strategy or policies in the Local Plan.

Some of the key issues that need to be addressed in the Local Plan and initial findings from the evidence are outlined below:

### **Housing:**

The Local Plan will need to set out the Council's strategy for delivering new homes in the District over the plan period. As part of this, the Plan will need to identify:

- Housing need over the plan period i.e. how many homes need to be delivered in the District over the next 20 years;
- A revised settlement hierarchy to reflect the Council's growth strategy;
- Site allocations for delivering new housing development within the District; and
- Detailed development management policies covering issues such as affordable housing; approach to windfall development; gypsies and travellers; and housing type and mix. These policies (and others) will then form the basis of the determination of planning applications in the District.

The Local Plan should, as a minimum, provide for the objectively assessed needs for housing within the District (NPPF para 11). To determine the minimum number of homes needed in the District over the Plan period, Local Planning Authorities are expected to follow the standard method set out in the Planning Practice Guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

Applying the Government's standard method, the minimum annual housing need figure for the Dover District currently stands at 629 dwellings per annum (dpa), which over a 20 year period, equates to providing a minimum of 12,580 dwellings, and this requirement will be taken forward in the new Local Plan.

To inform the development of the Local Plan the Council has recently commissioned a review of the Strategic Housing Market Assessment that was carried out by Peter Brett Associates in 2017. This is to take account of the revised NPPF's requirements and definitions in relation to housing and will consider whether compelling circumstances exist to justify an alternative approach to the Government's standard method. This work is due to be finalised over this summer.

In addition to establishing housing need, the Local Plan is also required to identify a sufficient amount and variety of land for housing to meet the District's housing need, with the aim of supporting the Government's objective to significantly boost the supply of homes (NPPF para 59).

This means identifying land to deliver the housing needed for different groups within the community, including affordable housing, families with children, older people, students, people with

disabilities, service families, travellers, first time buyers, people who rent their homes and people wishing to commission or build their own homes.

To this end the Council have commenced work on a Housing and Economic Land Availability Assessment (HELAA) to identify a future supply of land which is suitable, available and achievable for housing and economic uses over the Plan period <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/Home.aspx>

The HELAA is an important step in the Plan making process and comprises a number of stages:

- Stage 1: Identification of sites through a 'call for sites', review of existing land allocations in the Core Strategy and Land Allocations Local Plan, review of planning permissions (including those which are unimplemented, withdrawn and refused), review of previous sites identified in the Strategic Housing and Land Availability Assessment and desk top review of other data sources
- Stage 2: Site assessment to determine whether a site is (a) suitable, (b) available and (c) deliverable.
- Stage 3: Windfall assessment
- Stage 4: Assessment review

The Council has completed stage 1 of this process (in terms of the Call for sites) and is currently assessing the suitability of sites for housing and economic uses (Stage 2(a)). Following this, the availability and deliverability of the sites will be assessed and sites will ultimately be colour coded as follows:

- **Red** – not suitable/available/achievable
- **Amber** – potentially suitable/available/achievable
- **Green** – suitable/available/achievable

Each site has been given a unique reference number which is on a settlement basis (e.g. DEA/SUT/LAN etc). Work on the HELAA is currently ongoing and has not yet reached any initial conclusions.

This exercise will assist the Council in demonstrating a supply of specific deliverable sites sufficient to provide 5 years worth of housing against the housing requirement set out in the Local Plan, as per para 73 of the NPPF and the requirement to allocate land for a minimum of 12,580 dwellings.

In addition to dealing with strategic issues, such as housing need and distribution, the Local Plan is also required to set out more detailed development management policies for housing to guide the determination of planning applications (NPPF para 28). Given this it is proposed that the Local Plan will also set out the Council's approach to:

- Affordable housing development: The Local Plan will need to set out the Council's strategy for affordable housing provision in the District. The Council's strategy will be informed by the review of the SHMA which is underway, and will need to be tested as part of the Local Plan viability study.
- Self and Custom Build Housing: The Local Plan will need to both allocate land for self and custom build development and set out the Council's policy approach to determining self and custom

build applications, to ensure we are according with the terms of the NPPF and the Self Build Regulations.

- Gypsies and Travellers: The Local Plan will need to allocate land for Gypsy and Traveller sites and set out the Council's policy approach for the determination of applications for Gypsy and Traveller pitches. The Gypsy and Travellers Accommodation Needs Assessment (GTAA) <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-GTAA-Report-2018-Dec-21-Version.pdf> has found evidence of Gypsy and Traveller pitch need over the next five years (2017/18 to 2021/22) equating to 18.5 pitches under the 'cultural definition', or 12 pitches under the Planning Policy for Traveller Sites (PPTS) 2015 definition of Gypsy/Traveller. The GTAA has identified a 'cultural need' for 30 pitches and a PPTS need for 18 pitches (over the period 2014 – 2037). However, taking into account: potential turnover on local authority sites and opportunities for additional capacity, this would result in a residual cultural need for 12 pitches and the PPTS need is addressed.
- Windfall development: The Local Plan will need to set out the Council's policy approach to dealing with windfall development i.e. development which comes forward on sites outside those allocated in the Local Plan. As part of the development of this policy it will be necessary to review the Council's existing policy approach set out in DM1 of the Core Strategy and look at the function and purpose of the existing settlement confines and the approach towards unallocated sites that are adjacent to confines of sustainable settlements.
- Delivering a range and mix of dwelling types and sizes: The Local Plan will set out the Council's approach to delivering a wide range of house types, tenures and sizes to meet the District's housing need over the Plan period. This approach will be informed by the review of the SHMA which is underway.
- Residential extensions and annexes: The Local Plan will set out policies for the determination of applications for residential extensions and annexes.
- Rural exception sites: The Local Plan will set out the Council's approach to supporting opportunities for rural exception sites in the District to provide affordable housing to meet identified local needs.

Other policies in the Plan concerning design, density, parking, flood risk etc will also be relevant to delivering the Councils housing strategy and the determination of individual applications for housing.

### **Employment:**

The Local Plan will need to consider and create the right conditions in which businesses can invest, expand and adapt. At the time of preparing the Core Strategy (which was prepared prior to the economic recession and the recent BREXIT discussions), the economic prospects for the District were looking very positive. Clearly a key challenge for the Local Plan will be the need to allocate a range of sites to meet future employment needs which will involve assessing existing employment sites that have not yet come forward for development (to establish whether they should continue to be allocated for employment use or an alternative use such as housing) alongside the need to identify any new sites for employment whilst also considering the future role of town centres.

In order to assist with this process, an Economic Development Needs Assessment (EDNA) was completed by planning consultants Lichfields in March 2017

<https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report->

[01.03.17.pdf](#) The EDNA objectively assesses and evidences the need for economic development in the District up until 2037. The key findings of the EDNA were:

- All of the Council's allocated employment sites need to be reviewed and consolidated;
- More worrying is the EDNA forecast an increasing gap between Dover District and other parts of East Kent in terms of the main drivers of economic growth in East Kent by 2036;

Lichfields concluded that an economic strategy should be developed for the District which clearly establishes the Council's aspirations and vision for economic growth both in overall terms and for particular areas / key sites.

#### **Retail:**

Another key issue that will need to be addressed in the Local Plan will be how much additional floorspace will be needed to support the anticipated increase in population. As previously mentioned, this is a time when the future of retailing in town centres especially is changing at a rapid pace. Regenerating and future proofing town centres is high up on national agenda and is under very close scrutiny with various Select Committees and Government reports, which have been published on the future role of high streets and various funding streams being made available, such as the £675 million Future High Streets Fund and £40 million for the establishment of Heritage Action Zones.

In order to assess the amount of retail floorspace that would be required in the District over the Local Plan period, a Retail & Town Centre Needs Assessment was completed by Carter Jonas in July 2018 <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Retail.aspx> The key findings from the retail study, which included a household survey of 1,000 respondents were:

- Convenience goods (i.e. food) retention (i.e. the amount of money that is spent in the District) has decreased marginally from 76.3% in 2012 to 73.6% in 2017
- Comparison goods (i.e. clothing) retention in the District has decreased from 45% in 2012 to 38% in 2017.

Assuming constant share (i.e. everything else being equal), the key focus for the Council is to increase retention rates and clawback expenditure to its centres first and other outlets secondly. The assessment of overall quantitative capacity for new (convenience and comparison goods) retail floorspace over the period to 2037 identified:

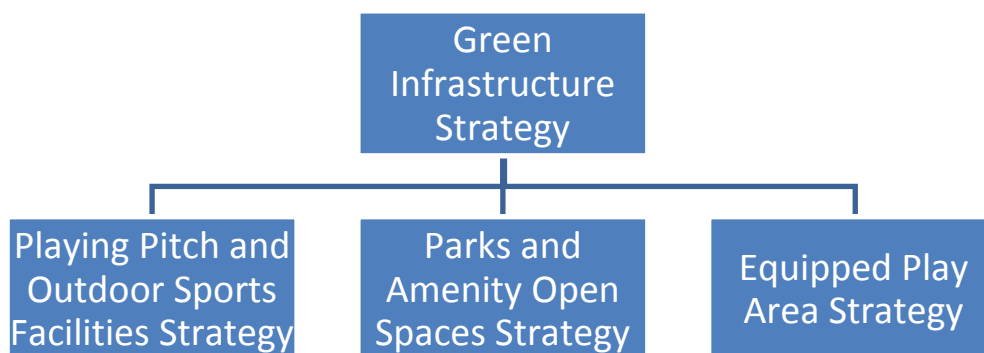
- Convenience goods – District wide forecast capacity over the plan period to 2037 can be accommodated by existing commitments
- Comparison goods – there is no District wide capacity for new comparison goods floorspace over the short term (to 2022) and the medium term (to 2027). By 2032 there is the capacity for 615sqm net rising to 3,243 sqm net by 2037.

The future of the District's high streets and future proofing them in terms of the use of space, attracting inward investment, supporting regenerating initiatives and repositioning high streets in order to meet the challenges of short, medium and long term are all key questions that the Local Plan will need to address.

## Open space and recreation

In recognition that the Local Plan needs to also contribute to and enhance the natural environment the Council has appointed consultants to update three strategies: Playing Pitch and Outdoor Sport Facilities Strategy, Children's Equipped Play Areas Strategy and Parks and Amenity Open Space Strategy. Alongside this work there is a need to update the Council's existing Green Infrastructure Strategy which is being designed to assist in shaping and coordinating the delivery of green infrastructure, to provide social, environmental and economic benefits now and in the future. Work on all of these Strategies is currently ongoing and once they are completed they will be used to inform the proposals and proposals in the Local Plan <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Green-Infrastructure.aspx>

The relationship of the new suite of strategies is shown below:



## Visitor and Tourism Strategy

The Council is in the process of developing a new Visitor & Tourism Strategy which is being prepared alongside the Local Plan. This Strategy is a key part of the Local Plan evidence base as it has been recognised by the Council that the visitor economy, visitor experiences and tourism are an increasingly important catalysts for social, economic and physical regeneration. The Council has identified that there is a major opportunity for our whole community to further build and capitalise on the diverse range of visitor opportunities and experiences across the district. Incorporating the key findings from this Strategy into the Local Plan will be a key way that the district will be able to realise the full potential of visitor assets and experiences to establish Dover District on the national and international map as a 'Destination of Choice'.

## Heritage Strategy

A key component of the existing Heritage Strategy <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Heritage.aspx> is to promote a greater understanding by the Council, landowners and local people of the heritage assets in the District. One of the best ways of raising appreciation of the historic environment, developing a sense of place for communities and helping to sustain and realise the benefits of heritage assets is to engage and encourage local people and groups to take a leading role in heritage activities. The Heritage Strategy is currently in the process of being updated in order to take into account the new NPPF/PPG and this work will need to be used to inform the approach taken towards heritage assets in the Local Plan.

## Sustainability Appraisal/Habitats Regulations Assessment

LUC have been appointed by the Council to prepare a Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) alongside the preparation of the Local Plan. The primary role of the SA is to promote sustainable development by assessing the extent to which the emerging Local Plan, when judged against reasonable alternatives, will help to achieve its environmental, economic and social objectives. A key part of the SA process is to assess a range of genuine and meaningful alternative scenarios about how growth could be distributed across the District. The SA is, therefore, the principal means by which the Council reports the local plan-making process, including the reasons why each option has been identified for consideration, and the justification for selection and rejection of specific options.

It is a requirement of the EU 'Habitats Directive' 1992 (hereafter referred to as the Habitats Directive) (1) and the Conservation of Habitats and Species Regulations 2017) that 'land use plans' (including local authority Local Plans) are subject to an 'Appropriate Assessment' (AA) if it is likely that they will lead to significant adverse effects on a Natura 2000 site (Special Areas of Conservation (SACs), and Special Protection Areas (SPAs)). Potential SPAs (pSPAs), candidate SACs (cSACs), Sites of Community Importance (SCIs) and Ramsar sites will also be included in the assessment. The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. LUC have been commissioned to undertake a HRA of the Local Plan.

When the HRA was undertaken of the Land Allocations Local Plan, it concluded that, due to the existence of the Thanet Coast and Sandwich Bay SPA and Ramsar Mitigation Strategy and the requirement for all new dwellings to contribute towards this Strategy to deliver enhanced management of the SPA. The Thanet Coast and Sandwich Bay SPA and Ramsar Mitigation Strategy is in the process of being updated as part of the work on the Local Plan.

### **What key characteristics of the District will need to be taken into consideration as part of the development of the Local Plan and the creation of spatial growth options?**

The District has a number of natural assets that help to shape and inform the characteristics and distinctiveness of the District. It will be important that the development of the Local Plan, in conjunction with SA/HRA, takes these fully into account:

#### **Landscape**

About 6,900 hectares (21%) of the District are designated as part of the Kent Downs Area of Outstanding Natural Beauty (AONB) and of this 876 hectares (3% of the District) are designated as Heritage Coast, centered on the white cliffs either side of Dover. The Kent Downs AONB Management Plan provides additional information on the quality, condition and management priorities <https://www.kentdowns.org.uk/landscape-management/management-plan/>

The NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, and that major development within the AONB should not be permitted other than in exceptional circumstances, including the need to demonstrate a lack of alternatives outside the designated area.

The SA Scoping Report recognises that the District contains a number of distinct rural landscapes which could be harmed by inappropriate development. It states that 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.

### **Heritage/Archaeology**

Dover District has an extraordinarily rich historic environment, including a vast wealth of both designated and undesignated heritage assets, which as a group are considered to be of outstanding significance. These heritage assets, in all their aspects, have played a major role in shaping the District's development and identity. Heritage assets can provide a unique opportunity for place-making and guiding and stimulating regeneration.

There is a wide range of potentially negative impacts that could cause harm to the heritage assets of the District, including both direct impact through construction activities and impact on the wider setting of heritage assets.

The NPPF acknowledges the important social and economic role that the historic environment can play, both for existing communities through heritage led regeneration and as part of new development proposals. The historic environment has a key part to play in the Government's wider sustainability aims and this is particularly true for Dover, a District that has a historic environment of the highest significance.

The SA Scoping Report notes that 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.

### **Flood risk**

The risk of flooding within the District is diverse; the coastal settlements of Sandwich, Deal and Dover are all shown (to some degree) to be at risk of flooding from the sea, with the River Stour and River Dour presenting a fluvial risk of flooding to the settlements bordering these rivers. The centre of the District is in parts low lying, and the varied topography throughout the district can present a risk of surface water flooding to both rural and urban communities alike.

In lower lying areas of the District, groundwater is another primary source of flooding, as a result of predominant chalk geology. The Council's updated Strategic Flood Risk Assessment provides information on all sources of flooding, together with a detailed means of appraising development allocation sites and existing planning policies, against the risks posed by flooding over this coming century <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Flooding.aspx>

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk of flood risk. Any plans should apply the sequential, risk based approach to the location of development by steering development to areas of lowest risk of flooding. Development should not be allocated or permitted if there are reasonable available sites in areas of lower risk of flooding.

The SA Scoping Report makes particular reference to the land to the north of Deal where the coastal defense structures are at greatest risk of breaching.



## **Biodiversity**

The District has a very significant wildlife interest reflected in the designation of 2,211 hectares as Sites of Scientific Interest, of which five sites also have European designations and are part of the Natura 2000 network of internationally important wildlife sites. In addition there are 40 Local Wildlife Sites covering an area of around 3,495 hectares and 6 formal nature reserves, two of which are National.

The NPPF states that Plans should identify a hierarchy of international, national and locally designated biodiversity sites and allocate land with the least environmental or amenity value and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. The NPPF specifically states that plans should identify and pursue opportunities for securing measurable net gains for biodiversity.

The SA Scoping Report makes reference to the fact that 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.

## **Infrastructure Planning**

Another key consideration for the Local Plan will be infrastructure, in terms of the availability and capacity of existing infrastructure, and the potential scope there is to improve, or expand the infrastructure, in order to meet demands arising from new development.

Initial discussions have taken place with a range of key infrastructure and service providers. To date these have not identified any locational specific issues that might prevent specific options being considered, apart from known strategic issues such as the A2/Duke of Yorks roundabout, and the Whitfield roundabout, which would need upgrading if the Council wanted to avoid having a statutory objection to the Local Plan. However, it has become clear from these discussions that until the Local Plan growth options are quantified further, it is very difficult for the service/infrastructure providers to provide more specific responses. Part 2 of the work will therefore involve undertaking transportation modelling of the different distribution of housing sites in order to understand and qualify any implications on the highway network and what this means for the different growth scenarios.

Given the Government's increased emphasis on delivery, the Council is required, in dialogue with the infrastructure and service providers, to produce and keep up-to-date an Infrastructure Delivery Plan (IDP). Infrastructure is commonly split into three main categories, defined as:

**Physical:** the broad collection of systems and facilities that house and transport people and goods, and provide services e.g. transportation networks, housing, energy supplies, water, drainage and waste provision, ICT networks and public realm.

**Green and Historic:** the physical environment that forms part of the character and setting of our towns and villages. A network of multi-functional open spaces, including formal parks, gardens, woodland, green corridors, waterways, street trees and open countryside. It also includes built heritage assets which form part of the physical environment.

**Social & Community:** the range of activities, organisations and facilities supporting the formation, development and maintenance of social relationships in a community. It can include the provision of community facilities (education, healthcare, community centres, sports & leisure facilities) as detailed in the Community Infrastructure Levy (CIL) regulations. In its broadest sense infrastructure can also include small scale funding to assist local projects, skills development and volunteering.

The IDP will therefore need to identify:

- Infrastructure needs and any infrastructure already committed;
- Costs;
- Responsibilities for delivery;
- Funding sources, identifying where developer contributions will be required;
- Indicative funding gaps and the potential nature of developer contributions; and
- Timescales.

The production of the IDP will ensure that the additional infrastructure and services needed are identified and delivered in a timely, co-ordinated and sustainable way. Planning for infrastructure should be a continuous and iterative process, and information on infrastructure requirements and delivery will change over the course of preparing the Local Plan. The IDP is, therefore, a 'live' document that will be updated at appropriate stages during the plan making process. The intention would be to engage and consult with the relevant infrastructure providers on the different strategic growth options so that the infrastructure implications of each option are clearly understood.

The NPPF requires Local Plans to make sufficient provision for infrastructure such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan.

The SA Scoping Report makes reference to the need to manage Port-related congestion along the M20/A20, M2/A2 which 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 (SA objective 4).

The SA Scoping Report makes reference to the capacity of the sewerage network, which could pose a threat to meeting these future development needs, particularly in Whitfield.

## **Whole Plan Viability**

The NPPF requires the Local Plan to clearly set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (as identified above).

It is important that these requirements do not undermine the deliverability of the plan. For sites identified in the Local Plan, this means it must be demonstrated that the cumulative cost of all policy requirements (i.e. affordable housing, infrastructure contributions etc.) are not such that it would be unviable to develop that site. This is done by way of a whole plan viability study.

The revised NPPF and accompanying policy guidance are clear that the role for viability assessment is now primarily at the plan making stage. This states that the drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. Policy requirements for each site should be clear so that they can be accurately accounted for in the price paid for land.

This does not however mean every individual site will need to be individually tested to ensure they are viable at the plan making stage. This is because detail around specific sites will be unknown. As such, the whole plan viability study will use a number of assumptions (e.g. average sales values, build costs, professional fees etc.) based on reasonably available evidence. Different viability areas based on these assumptions may be identified as part of this process and requirements may be set for different types or location of site or types of development.

Site specific viability assessment will however be necessary for certain sites. This may include large sites that are to provide a significant proportion of planned supply, or sites that are critical to delivering the strategic priorities of the plan such as a new road or other such key infrastructure.

Overall, the whole plan viability study will be an iterative process which will develop closely alongside the IDP and the other such key pieces of the evidence base. Consequently, proposed policy requirements may need to be refined along the way so as to ensure the Local Plan contains demonstrably realistic and deliverable policies.

### **What were the key issues arising from the Local Plan workshops?**

In order to inform the Local Plan review process, a series of workshops were organised with members of the District Council Leadership Forum, developers, landowners, agents, stakeholders and students during 2018 to obtain their initial thoughts on a new vision, objectives and to consider how the Council could meet the future needs of the District

<https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/Home.aspx> A further workshop also took place on the Visitor and Tourism Strategy in early 2019 which will also be used as evidence for the Local Plan <https://www.dover.gov.uk/News/Press-Releases/2019/Tourism-Workshop-Plans-For-Future-Growth-In-District's-Visitor-Economy.aspx>

The feedback from Local Plan workshops is summarized by theme below:

#### **Delivering a sufficient supply of homes:**

- There were contrasting views at the Local Plan workshop as to whether the Local Plan should continue to focus on Dover where there is the most need for change but where the housing market is not as strong as for example, in Deal and the rural area;

- Promote a settlement hierarchy with the focus on Dover;
- Need to deliver a sufficient amount of housing whilst also broadening the range and offer
- Emphasis should be on the provision of affordable and rural housing;
- Need to identify proactive ways of delivering new homes e.g. the Council's role and partnership working;
- Change policies to enable housing growth;
- Consider proportional development to existing communities (including Hamlets);
- Protect and retain the rural character of remaining villages through proportional and organic growth e.g. 10 - 20% increase proportional to the size of the settlement which is unlikely to change the character of the settlement;
- Consider a new settlement if there was a suitable opportunity in the District;
- Promote residential building in town centres;
- Allocate medium and smaller sites instead of larger sites (including self-build sites);
- Allocate a range of different sized developments; and
- Plan and embrace our ageing population and coastal location.

### **Building a strong a competitive economy**

- Create international businesses in Dover and make this the USP and build on links with EU;
- Encourage new businesses into the District;
- Address low working age population and skills shortage;
- Develop employment base and build on the back of successful businesses;
- Retain young people to live and work in the District;
- Create an environment for business start ups and incentives for new businesses to come to the District;
- Address the skills deficit particularly in relation to heritage preservation as well as developing arts/culture;
- Develop opportunities for further education to bring people into the District;
- Develop a range of educational opportunities for all abilities and interest;
- Maximise open golf – rebrand as 'destination golf' but not just about the Open;
- Build on the strengths of the District (maritime and heritage);
- Enhance the visitor experience in Sandwich for example, open golf (parking etc);
- Recognise the importance of the town in terms of tourism opportunities from the Castle, Port and White Cliffs;
- Integrate/link together the tourism attractions; and
- Dover – skills need broadening;

### **Ensuring the vitality of town centres**

- Regenerate Dover town centre and improve links to the Port and St.James's;
- Promote urban living particularly in Dover town centre (living above shops);
- Focus business in Dover town centre with good transport connections in order to increase; footfall and make Dover town centre a pleasant place to be;
- Encourage new events to bring people into Dover town centre and bring people from Dover Castle into the town;
- Encourage 'three days and three towns' – the triangle; and
- Encourage buses that serve Dover Castle to continue to the White Cliffs visitor centre and

Dover town centre;

### **Promoting healthy and safe communities**

- The Plan should enable healthy communities;
- Enhance sport, leisure and recreational opportunities across the District;
- Improve accessibility of our natural and historic assets;
- Support collaboration and active promotion of initiatives (buses in parishes, NHS, KCC facilities etc);
- Create a healthy environment in the District by having good access to services, schools, walkability etc;
- Address social deprivation through inclusive, engaged population using Arts as a cohesive force;
- Ask developers to demonstrate how their development meets the health and wellbeing agenda;
- Strengthen access to open spaces and promote walkable neighbourhoods; and
- Promote development that is innovative, beautiful, energy efficient housing that people want to live in.

### **Promoting sustainable transport**

- Promote sustainable transport particularly in rural areas;
- Encourage walking, cycling and public transport;
- Improve physical and virtual links;
- Improve transport – encourage different modes of transport (buses, cycling, electric cars etc);
- Build in transport resilience across the District;
- Improve strategic traffic management to and through Dover town;
- Promote a low carbon District;
- Create good transport links – build on existing hubs (road and rail) or where it is easy to extend existing services; and
- Promote development that is in a sustainable location and has access to a range of services.

### **Supporting high quality communications**

- Greater support needed for small businesses and start ups to invest in digital technologies and infrastructure;
- Need to improve digital skills and ways of working (broadband);
- Support digitally enabled, superfast broadband especially in the rural areas;
- Improve and devise new technology that supports the economy;
- Develop the digital agenda in terms of infrastructure and skills;
- Improve infrastructure and utilities with incentives;
- Deliver timely infrastructure delivery;
- Match housing infrastructure and transport;
- Better management and control of contributions for infrastructure;
- Work collaboratively with all partners on the delivery of key infrastructure;
- Develop a transport strategy – dual the A2 – manage the Port traffic and housing growth;

- Improve car parking availability (Deal mostly);
- Reduce negative impacts of transport infrastructure and traffic (cross Channel);
- Promote fewer but larger developments to secure infrastructure;
- On site infrastructure must be in place first and select sites that have minimal impact on existing infrastructure;
- Be aware of infrastructure challenges on new developments;
- Water, sewage, energy all need to be carefully considered; and
- Harness the power of development to address infrastructure issues in Deal.

### **Making efficient use of land**

- Need to make the most of brownfield sites and make the most of sites which are capable of higher densities especially in urban areas.

### **Achieving well-designed places**

- Need to raise the design quality of new housing in Dover town and existing stock;
- Protect and retain the rural character of remaining villages through proportional and organic growth;
- Support proportional growth in village e.g. 10 - 20% increase proportional to the size of the settlement which is unlikely to change the character of the settlement;
- Consider 'Cottage Style' development as per Outer London (e.g. 50 units max at villages and hamlets);
- Need to develop clear standards for design – space standards and energy efficiency;
- Promote more distinctly 'Dover' housing to reflect local need;
- Provide diverse housing in rural areas;
- Emphasis on the positive contribution that development could make to a settlement;
- Promote development innovative, beautiful, energy efficient housing that people want to live in; and
- Not just about the delivery of housing as needs to be a place where people want to live in terms of a Fun place;

### **Meeting the challenge of climate change, flooding and coastal change**

- The Plan needs to mitigate and adapt to the forecasted impact of climate change;
- Focus on flood risk, renewable resources and ecosystem services;
- Encourage creative design to reduce the risk of building in flood risk areas;
- Low carbon district; and
- Focus on energy efficiency.

### **Conserving and enhancing the natural environment**

- Protect, enhance and improve accessibility of the District's National Features (AoNB);
- Invest in our natural assets;
- Development needs to fit within the environment that it is located;
- Develop land in lower landscape value; and
- Development on least environmentally constrained land.

## Conserving and enhancing the historic environment

- Look at derelict buildings to see if there is enabling development that can assist with restoration;
- Development should respect the existing historic development/grain of the settlement;
- Sandwich/Deal should retain their attractive character and historical significance;
- Build on links/connections to Dover Castle and 'connect' destinations together through walking/cycling/green infrastructure/public transport;
- Maximise Dover's heritage and the District as whole (e.g. Sandwich);
- Balance between old and new – need to sort out some of the existing problems first;
- Address the skills deficit in heritage preservation;
- Most historic assets are seasonal – people are there but the attractions are not open;
- Create the district as an excellent year round destination; and
- Small attractions area often overlooked.

Clearly some of the key outcomes from the workshops can be addressed and incorporated into the Local Plan, whereas some of the points that were raised at the workshops can be delivered through other strategies, or through the Council's new Corporate Plan. In order to ensure that the points that were raised at the workshops are fully considered, there will need to be iterative process of reviewing the issues that have been raised through the workshops as part of the development and refinement of the Local Plan.

## Future Growth Strategy

### New vision and strategic objectives for the Local Plan

The new Local Plan will set out what the Council intends to achieve for the District over the next 15 years. This will be articulated within an overarching vision which informs all of the policies and objectives within the plan.

The vision should use the evidence base and key outcomes from the Local Plan workshops, along with the existing and emerging Local Plan evidence base and be locally specific, avoiding generalised aspirations. It will reflect the Council's vision and priorities set out within the Corporate Plan 2016-2020 and any replacement, which will be complementary to the vision for the new Local Plan.

Key elements of the vision will be to:

- Transform the District through the delivery of sustainable housing and economic growth that meets the needs of the whole community both now and in the future and respects the character and significance of existing place.
- Enhance and promote the unique character of the District to attract people and businesses to visit the District, invest in the District and locate in the District.

- Continue the regeneration of Dover Town through the development of a co-ordinated, multi-agency strategy addressing housing, employment, retail, social and environmental issues.
- Ensure that the social, economic and environmental opportunities associated with growth are fully realised and that new infrastructure is provided in the right place, at the right time, to support local residents and businesses.
- Protect, enhance and improve the accessibility of the District's important natural and historical assets.
- Put the District in the best position to respond to future changes, be these economic, social or environmental to safeguard the future of its residents and businesses.

The vision will then be supported by a number of objectives specific to each of the topic areas. The below represents initial suggested objectives, again informed by the stakeholder consultation workshops undertaken across the summer of 2018, along with the existing and emerging Local Plan evidence base:

<b>Local Plan Chapter</b>	<b>Objectives</b>
Housing	<ul style="list-style-type: none"> <li>• To provide greater housing choice across the Dover District for existing and future communities</li> <li>• To support and strengthen the hierarchy of settlements in the District to ensure development that takes place contributes to the sustainability of local communities and services.</li> </ul>
Employment and the Economy	<ul style="list-style-type: none"> <li>• To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.</li> <li>• To support opportunities to strengthen the role of Dover, Deal and Sandwich Town Centres through diversification and enhancement.</li> <li>• To grow the Dover District as a tourism destination by promoting its unique heritage and stunning environment</li> </ul>
Transport and Infrastructure	<ul style="list-style-type: none"> <li>• To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.</li> <li>• To improve connectivity and movement utilising existing infrastructure, and securing the delivery of new, and necessary infrastructure upgrades in order to meet the changing needs of people and places in the District.</li> </ul>



Design	<ul style="list-style-type: none"> <li>• To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which respect the character of the District and that people can be proud of.</li> <li>• To support opportunities for future-proofing developments so that they can adapt to changing social, environmental, economic needs and take advantage of advancements in technologies and be adaptable and respond to climate change.</li> </ul>
The Natural and Historic Environment	<ul style="list-style-type: none"> <li>• To conserve and enhance the District’s important natural, historic, water and built environments, to ensure these assets can continue to be experienced and valued by residents and visitors alike and protected from inappropriate development.</li> <li>• To protect the Districts historic and natural environment.</li> <li>• To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and their positive role in reshaping/regenerating the District.</li> <li>• To conserve and/or enhance the district’s biodiversity, including all statutory and none statutory wildlife sites and priority habitats and to enhance ecological connectivity between them.</li> <li>• To conserve protected and priority species and enable their populations to expand throughout the wider countryside.</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• To work with the Council’s partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District’s people and places.</li> </ul>

It is important to note that all the final Local Plan objectives will be interlinked and read as a whole. These objectives will be refined following the selection and rejection of the specific options within this paper, and the outcomes of the Sustainability Appraisal (SA) process.

**Why do we need to consider alternative growth options?**

Central to any Local Plan decision making process, and at the heart of Government’s test of ‘soundness’ at the Local Plan Examination, is the requirement to consider and assess a range of options for delivering the required level of housing and economic development across the District. The growth options in the following section relate to all forms of development but in practice, the principal issue is the distribution of housing growth.

There is a requirement in the EU Directive and the Environmental Assessment Regulations that: “an environmental report should be prepared..., identifying, describing and evaluating the likely significant environmental effects of implementing the plan..., and reasonable alternatives taking into account the objectives and geographical scope of the plan...”

As a result of various court cases it has become very clear that the Council therefore needs to provide a clear account of:

- reasons given for selecting the alternatives;
- an accurate picture given to those consulted what reasonable alternatives there are and why they are not considered to be the best option; and
- clear reasons for rejecting alternatives.

This will be set out in the Sustainability Appraisal (SA) accompanying the Local Plan.

The requirements of the SA are very clear that Council's only have to assess reasonable alternatives and in this respect all of the spatial options are only high level theoretical alternatives that stake-out the parameters of discussion and assessment. Some elements of the options are not mutually exclusive and, to that degree, they can be considered as a menu. **The preferred option could be some form of amalgam of two or more of the options.** The Government is very clear that Local Plans should be realistic and in this respect, options should not be tested that cannot be delivered.

The main aim of the SA is to identify and compare the significant effects of the options – whether positive or negative accepting that there is in reality bound to be some level of uncertainty at this stage in the planning process. Owing to the fact that the development of this Paper is an iterative process, the SA will help to identify a high-level commentary on the most likely sustainable locations within the District and the functional relationships and strategic linkages between them, drawing on the evidence and framework set out and consulted upon in the SA Scoping Report.

### **How have the growth options been developed?**

In order to develop a range of growth options for testing, the Council has carried out the following exercise to establish a baseline from which to plan from:

- Review of existing plans and strategies at a national, regional and local level – including the existing growth strategy set out in the Core Strategy and Land Allocations Local Plan
- Identify the existing constraints – for example landscape designations, flood risk, heritage assets etc
- Review of the evidence base to identify key issues to be addressed as part of the growth strategy
- Initial stakeholder and community engagement to discuss issues and opportunities to be addressed in the new Local Plan
- Development of draft vision and objectives to inform the overarching growth strategy

Following this, a series of high level theoretical options were generated and these are set out below:

- **Proportionate growth** – under this scenario each settlement would take an amount of development that is in proportion to its population according to the latest published population figures
- **Urban focused growth** – under this scenario growth would be focused around the urban areas in the District, with a 20% increase in the size of the settlements of Dover, Deal, Sandwich and Aylesham. The remainder of the growth would then be distributed across the rest of the settlements in the District in accordance with a revised settlement hierarchy

- **New Settlement** – under this scenario the majority of the growth would be focussed at a new settlement, with the remainder of the growth distributed across the rest of the settlements in the District in accordance with a revised settlement hierarchy
- **Delivering a higher level of housing growth than the Councils existing housing target of 629 dwellings per annum** - As a minimum the Council has to plan to meet its housing target of delivering 629 dwellings per annum. However, given that this figure shouldn't be seen as a ceiling to delivery, the Council does have the option to deliver a higher level of housing growth over the Plan period.
- **Meeting any unmet housing need outside of the District under the terms of the Duty to Co-operate** - The NPPF places great emphasis on the Duty to Co-operate and the need to demonstrate that Council's can meet each own housing requirements. However, if a Council can clearly and robustly demonstrate that it is unable to meet its own housing requirement, then it can come to an agreement with a neighbouring Council to meet some or all of the housing need. Given this, another option for the Council is to come to an agreement with a neighbouring authority to deliver some of its housing growth, if it can demonstrate that it cannot wholly be delivered within its own District.

The different spatial options have used, as starting point, data from 2011 Census, rather than the 2017 mid year population estimates, which are, by their very nature, only population estimates. It must, however, be recognized that that 2011 Census data does not for example, pick up on the population growth that has taken place at Aylesham since 2011. It is also the case that this may be further refined following the outcome of the PBA SHMA work or further population data releases by the ONS.

The Council then undertook an initial sifting exercise to remove potential options that were considered not to be reasonable. As part of this, two options were removed from further consideration and the reasons for this are set out below:

- **Delivering a higher level of housing growth than the Council's existing housing target of 629 dwellings per annum:** It is not considered that this is a viable growth option, the reason for this being that that the Council has only managed to exceed delivering more than 505 dwellings once since the Core Strategy was adopted in 2010. As a result of this, this option has been ruled out at this stage, as it is not considered to be a reasonable alternative that should be tested, as evidence suggests that this option could not be delivered.
- **Meeting any unmet housing need outside of the District under the terms of the Duty to Co-operate:** Owing to the fact that the HELAA work has not yet come to a conclusion, and as it currently stands Dover District Council is intending to meet its own housing needs, this is not considered to be a viable growth option at this stage, as there is not the justification for this approach.

Further consideration will need to be given to alternative levels of growth to the housing need figure generated through use of the Government's standard method (629 dpa, which over a 20 year period, equates to providing a minimum of 12,580 dwellings) following:

- completion of PBA's SHMA work,
- a review of the findings of the SA of the initial growth options,

- further discussions with neighbouring authorities; and
- any subsequent changes to the Government’s standardised methodology.

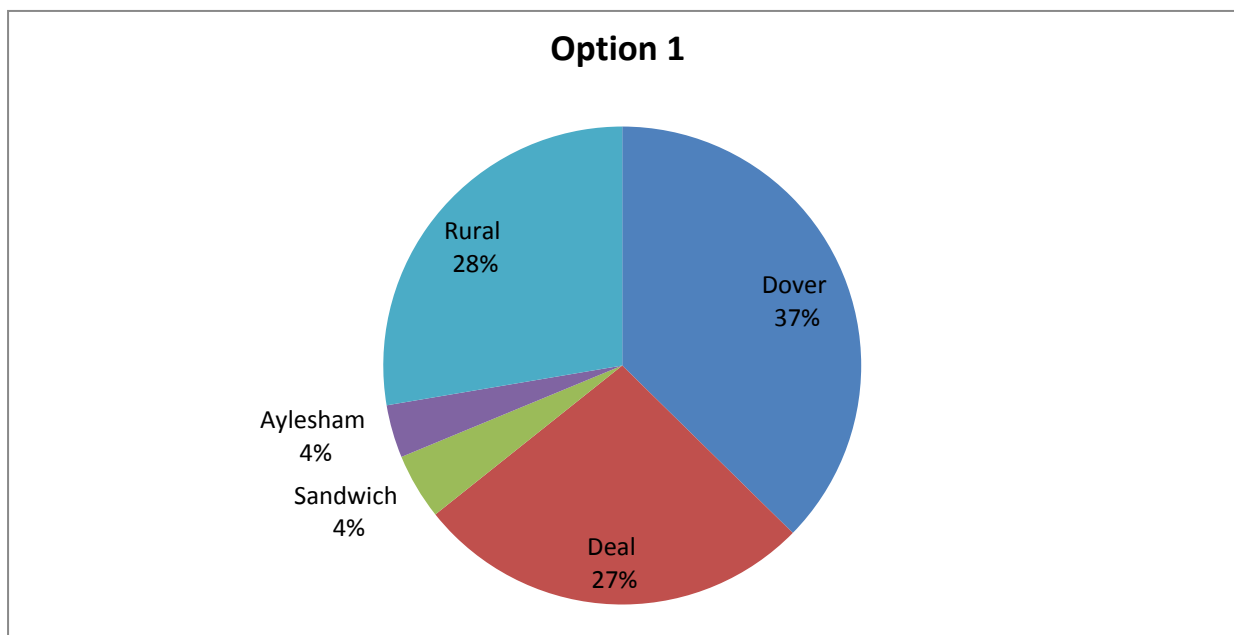
Three potential growth options will therefore be taken forward for further testing and these are explored in detail below. It should however be noted that the Local Plan growth option that is eventually included in the Local Plan could be amalgam of one or more of the options, but for the purposes of this Paper they have been kept as distinct options so that they can be compared and contrasted for the purpose of testing.

**Which growth options will be taken forward for further testing?**

It is important to note that all of the growth options in the preceding section involve Dover taking a lesser percentage of housing growth than the Adopted Core Strategy. The reason behind this is that Dover has failed to deliver the level of housing development that has been identified in the Core Strategy and there is not any evidence to suggest that things would be different in the future.

**Option 1: Proportionate Growth**  
 Under this scenario each settlement would take an amount of development that is in proportion to its population according to the latest published population figures

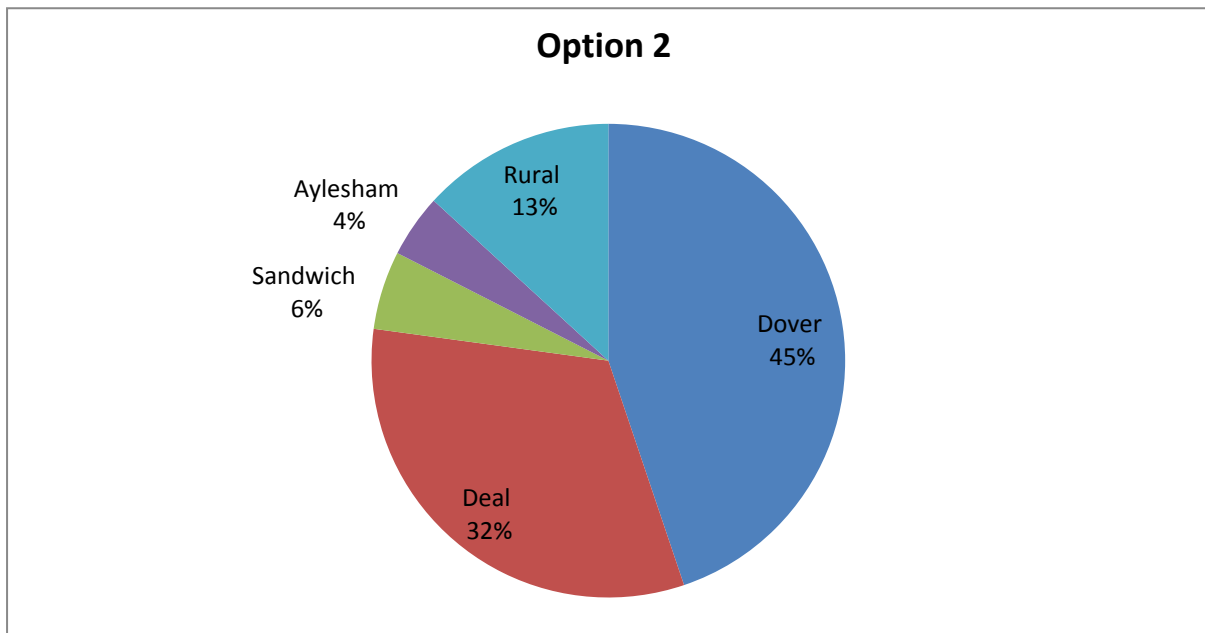
This option is based on analysis of each of the settlements and allowing them to grow proportionally based on 2011 Census. This option would provide for development across the District, which may assist in creating a more diverse housing market (especially in rural areas), and supporting service. However, this option, as it stands, takes no account of constraints such as flood risk, landscape designations such as the AONB, or the social capacity for a settlement to accommodate development, as it treats all settlements on an equal basis. Further testing of this option is therefore required to assess whether it is capable of being delivered.



**Option 2: Urban focused growth**

Under this scenario growth would be focused around the urban areas in the District, with a 20% increase in settlement size planned for Dover, Deal, Sandwich and Aylesham. The remainder of the growth would then be distributed across the rest of the settlements in the District in accordance with a revised settlement hierarchy

Option 2 is more aligned with the Council’s existing growth strategy and government policy that town centres and urban areas need to adapt and intensify the amount of residential development, as they have good accessibility to a range of services and facilities. Subject to appropriate design and layout, urban areas offer the greatest opportunity to convert vacant buildings into living spaces and therefore maximise the use of brownfield land in the District to deliver new development. This often means developing sites in low value areas. However, the high costs associated with bringing them forward may impact on timescales for delivery and the overall deliverability of the plan. There also needs to be a very careful balance in order to ensure that there is not too much infringement upon the commercial sector, whilst also providing suitable homes. Further testing of this option is therefore required to assess whether it is capable of being delivered.



**Option 3 – New Settlement**

Under this scenario the majority of the growth would be focussed at a new settlement, with the remainder of the growth distributed across the rest of the settlements in the District in accordance with a revised settlement hierarchy

A key issue for the Council to consider is whether the principle of a new settlement should be explored at this stage in the Local Plan process and this was raised as a potential option as part of the Local Plan workshops, providing that there was a suitable location in the District.

This decision will, to a degree, be informed by the outcome of the Housing and Economic Land Availability Assessment, as if the Council cannot identify a sufficient number of suitable sites around

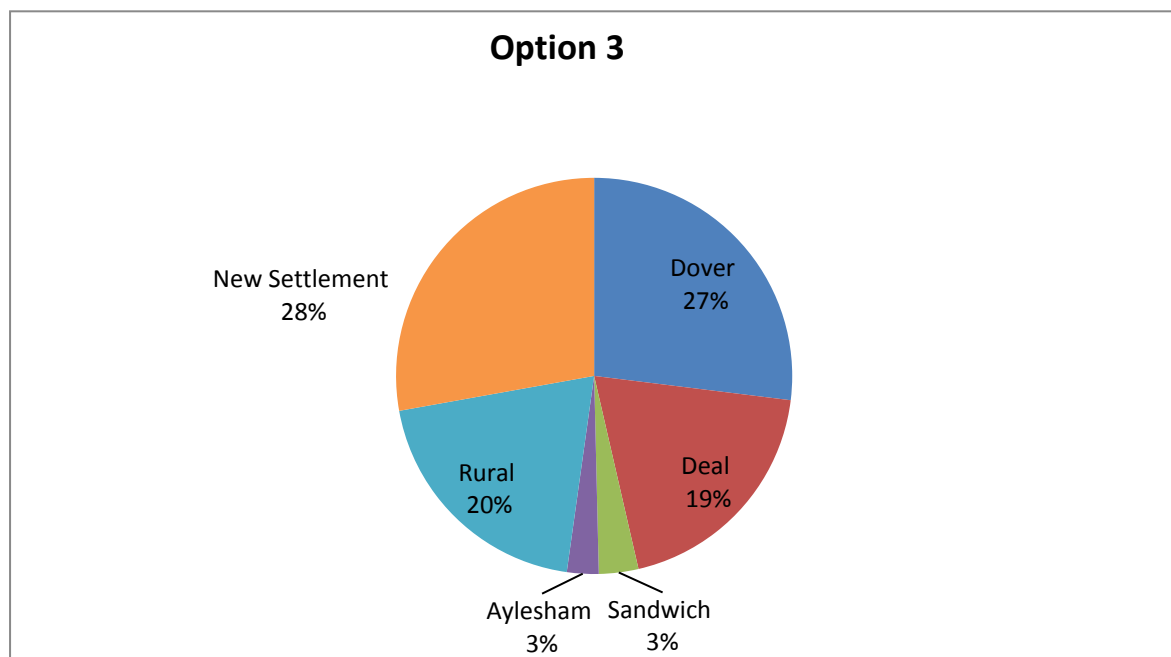
existing settlements to deliver its housing target of 629 dpa, then it will have to consider the option of whether new growth could also be delivered as part of a new settlement. Under this option a proportion of the Council's housing growth would therefore be provided in a new settlement, with the remainder distributed across the District.

However, the process of planning for a new settlement is lengthy, and will require further evidence to justify:

- The size of the settlement we are planning for (now and in the future)
- The location of the new settlement
- What infrastructure is required to support the new settlement
- What mitigation measures are required to address any impacts arising from the new settlement

In order to undertake any meaningful testing of this particular growth option (e.g. highway modelling and discussions with infrastructure/service providers), broad locations for a new settlement/urban expansion would have to be identified on a plan, and work would also need to be undertaken to determine the size of settlement we are planning for. It is important to note that option would need considerably more detailed work in order to test and refine and take this option forward. If this option was pursued any further, the timetable for the Local Plan would need to be reviewed and extended as there would need to be a comprehensive assessment of alternative locations for a new settlement. This could pose a risk in terms of speculative planning applications and the determination of appeals.

For the purposes of illustrating in this Paper how growth could be distributed across the District under this option, a theoretical capacity of a minimum of 3,500 homes has been identified in Option 3 as this level of development would be able to secure some local services. However, the actual size of the new settlement and what is the minimum size of the new settlement should be, in terms of supporting for example, schools and other local facilities would have to be determined through a much more detailed exercise.



## **Are these options reasonable and are there any options missing?**

A key part of this work is to ensure that before proceeding to the next steps – the testing stage – it is important to check to see whether the growth options are reasonable and there are not any other options that need testing.

In order to address this particular point, a series of engagement events are being planned with Town/Parish Councils and the Local Plan Policy Advisory Group in order to share with them the different high level theoretical growth options that have been identified, understand if any options are missing and to explain to them the challenge that the Council is facing in order to identify land to accommodate a minimum of 629 dwellings per annum. Any feedback from this and any future engagement processes will be incorporated into this Topic Paper.

## **Testing the growth options**

As set out in the introduction, this is only the first part of an iterative process. In accordance with the Planning Advisory Service's 'Good Plan Making Guide', September 2014 there are a number of ways to proceed with testing the growth options. The first is a 'deliverability test': is an option capable of being delivered? The following questions can then be used to test the alternative spatial options:

- How deliverable is the option?
- Is there the commitment from the delivery partners needed to make it happen?
- Is there time within the plan period to implement the option?
- Is it likely that the option will not be fully implemented for one reason or another? Ask 'what might go wrong with this option'?
- Is the option flexible enough to accommodate changing circumstances such as revisions to housing needs and site viability?
- Does the option give rise to any cross-boundary issues that will need to be considered early on?

In addition to this, a more detailed analysis of the constraints will need to be undertaken to test the deliverability of the different options. For example, Transport assessments, traffic modelling, landscape sensitivity and any high level heritage assessment work and discussions with infrastructure and service providers will also form part of the testing of the alternative growth options. Furthermore, all of the reasonable options must be tested through the SA. The SA should evaluate the different options and this work will then be used to refine them as the Plan proceeds. The SA should clearly set out the pro's and con's of each option in order to ensure that it is clear what the consequences of the different options are. If options are discounted because they are not deliverable, or for any other reason, it is important to record the decision why.

Once the testing has been undertaken there would be further discussions with Town/Parish Council and the Local Plan Policy Advisory Group on what the outcome of the testing is to help them understand the logic and rationale for the preferred strategy.

Ongoing discussions have been held with LUC as part of the development and refinement of Part 1 of this Paper. LUC have confirmed in their view that the spatial options that have been included in this Paper represent a reasonable set of alternative spatial options for the purposes of SA at this

stage in the plan preparation process – please see the separate note that has been prepared by LUC. As this work is progressed to the next stages of testing any outputs from this work can be fed into the SA work, and the SA findings will be used to inform the selection of a preferred spatial strategy and strategic, site allocation and development management policies. Should the Council wish to test any growth options that are likely to generate significant adverse impacts, appropriate mitigation measures would be explored through the Plan-making process, as the Local Plan is refined and developed.

### **Next Steps**

A number of next steps have been identified to progress this work and move forward with the testing of the growth options. These are set out below:

- Local Plan PAG meeting on the 10<sup>th</sup> July to discuss the Local Plan Topic Paper
- Town and Parish Council briefing on the 25<sup>th</sup> July
- Completion of the Housing and Economic Land Availability Assessment to identify a range of suitable housing sites to inform the testing of the growth options – end of August for the initial work
- More detailed analysis of existing constraints – late Summer/Autumn
- Engagement with infrastructure providers to test the growth options with them – late Summer/Autumn
- Highways modelling of the sites put forward under the HELAA process that might be allocated for development in the Local Plan - Autumn
- Sustainability Appraisal – ongoing
- Review of the settlement hierarchy and settlement confines as part of the development of a preferred growth option – Autumn

Following this, it is envisaged that the findings of this work will then be reported back in the late Autumn 2019.