

Sustainability Appraisal of Growth Options set out in the Dover District Council Local Plan Topic Paper: Overarching Strategy (Part 1)

- 1.1 It is important that the Local Plan making process (and therefore the Sustainability Appraisal (SA)) has appropriately considered all reasonable alternatives in selecting and refining options for inclusion in a Local Plan. This includes strategic options such as the quantum of growth to be planned for and the spatial strategy for accommodating growth, as well as detailed issues such as the specific sites to be allocated for development and how development is managed.

Meeting the requirements of national legislation, policy and guidance

- 1.2 National legislation, policy and guidance sets out the tests for identifying options for consideration in SA, specifically:

- The 'SEA Regulations'¹, which require the preparation of an environmental assessment report to inform the preparation of Local Plans. Regulation 12 (2) states that this report should *'identify, describe and evaluate the likely significant effects on the environment of implementing the Plan...and reasonable alternatives taking into account the objectives and the geographical scope of the plan.'* This can be interpreted to mean that options are only reasonable if they are in conformity with the Local Plan's objectives, which in turn should be in accordance with National Planning Policy and Guidance.
- Government Planning Practice Guidance on Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)², namely:
 - Paragraph 17 which states *'reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152³ of the National Planning Policy Framework (NPPF) should be referred to).'*
 - The NPPF (para 32) states that *'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).'*
 - The NPPF (para 8) sets out the three objectives of sustainable development to be delivered through the preparation and implementation of Local Plans:
 - 'a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

¹ HM Government, [Environmental Assessment of Plans and Programmes Regulations](#), 2004

² HM Government, [Guidance on Strategic Environmental Assessment and Sustainability Appraisal](#), 2015

³ The National Planning Policy Framework has since been updated in 2018 and 2019, with the text referred to in paragraph 152 now being located under paragraph 32. The latest version is available [here](#).

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

- Paragraph 18 which states *'the sustainability appraisal needs to compare all reasonable alternatives including the preferred approach...and assess them in the same level of detail as the option the plan-maker proposes to take forward...Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.'*

Compliance of the Growth Options with legislation and guidance

- 1.3 In LUC's view, the Local Plan Topic Paper: Overarching Strategy (Part 1) to inform the review of the Dover Local Plan is considered to comply with the relevant legislation, policy and guidance with respect to the consideration of reasonable alternatives at this early stage of the plan-making process⁴. It is sufficiently detailed and comprehensive to allow a meaningful comparison to be made between the defined options in the SA. In coming to this view, Dover District Council officers have confirmed that they consider the Local Plan Topic Paper: Overarching Strategy (Part 1) to include a suitable range of reasonable alternatives. Should further reasonable alternatives be identified as a result of evidence being gathered by the Council, including in response to public consultation comments, these will also be subject to SA as the plan preparation progresses.

How the SA will appraise the Growth Options

- 1.4 The SA will appraise the growth options against the SA objectives set out in the SA Framework finalised following consultation on the SA Scoping Report⁵ in 2018. This process will help identify the most appropriate locations for development in the District with a view to informing the selection of a preferred spatial strategy, including specific site allocations. At this stage three options within the Local Plan Topic Paper: Overarching Strategy (Part 1) will be appraised as reasonable options for distributing growth:
- **Proportionate growth** – under this scenario each settlement would receive 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 a significant proportion of the growth (over 25%) 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.
- 1.5 The SA will help appraise how well the growth options relate to the existing and planned communities, jobs, services and facilities, as well as road and rail infrastructure, within Dover District and neighbouring districts. Each option will also be appraised on the basis of its likely effects on environmental assets and constraints, such as biodiversity, landscape sensitivity, flood risk, soils quality and the historic environment, and how they help meet Dover District's needs, using available evidence and considering factors such as:
- Commuting patterns.

⁴⁴ It should be noted that LUC's view is based on our interpretation of the relevant legislation and guidance, and our professional experience. It is not a legal opinion. We have provided our view in good faith to Dover Council and, in doing so, this should not be interpreted as providing any warranty, expressed or implied.

⁵ Dover District Council New Local Plan, SA Scoping Report, February 2018

- Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues), and options to travel through use of sustainable transport options, such as rail.
- Accessibility not only to Dover, but also to the regional centres of growth, considering economic and social relationships and linkages.

- 1.6 Given the early stage in the development of the new Dover Local Plan, the high-level growth options only offer an indication of the potential spatial distribution of growth in the District. Consequently, it is acknowledged that some SA objectives provide more opportunity to draw out variations in the effects than others; given the lack of detail about the specific location, potential design, layout and scale of development that could take place.
- 1.7 Where appropriate, we will use the SA objectives to draw-out variations in the effects of the high-level growth options by identifying spatial variations in their extent, distribution and relationships with the District's existing pattern of development. However, it is important to note that development may not be appropriate in all areas and the SA will take into account where possible significant constraints and sensitivities should be avoided in order to minimise the potential for significant adverse effects.
- 1.8 To ensure that all growth options are appraised in a consistent manner, all the growth options will be appraised using the SA framework and assumptions set out in the Scoping Report, and using the same baseline information.