

Appendix A
SA Consultation Comments

Table A.1: Representation on Dover Local Plan SA Scoping Report

Consultation Comment	SA Scoping Report Reference	Response/Action Taken
Ash Parish Council		
<p>In general, Ash Parish Council felt there was a lack of reference to the rural areas and villages in the Report, and that it was Dover-centric.</p> <p>Their specific comments are made in relation to the following parts of the Scoping Report:</p>	General comment	The SA Scoping Report has drawn on all up-to-date and readily available evidence in establishing the baseline. The SA Framework will be applied consistently to all policies and site allocations in the new Dover Local Plan.
<p>Ash Parish Council acknowledge bullet point 2 of this paragraph, which states that the updated NPPF (due to be published in Spring 2018) will contain a new policy that seeks to increase the density of development around commuter hubs. Ash Parish Council notes however, that it will be difficult to integrate an increased density in rural areas which have railway links and may be seen as 'commuter hubs', with existing rural communities than those communities which are urban. They question whether this is reflected in the SA assessment criteria.</p>	Introduction – paragraph 1.23	With regard to paragraph 1.23, Table A1.1 sets out criteria for assesses the proximity to a range of local services and facilities, not just railway links.
<p>This chapter identifies national policies regarding health issues, but does not suggest how health issues will be addressed through the Local Plan. For example, bullet point 5 of para 2.49 which outlines how issues of obesity will be tackled, is very generalised. Additionally, the chapter does not acknowledge the problems associated with under-provision of health facilities in rural communities and the fact that people must travel by private transport to reach them. Further, it does not appear that this issue has been considered with regard to large housing developments being allocated to rural areas.</p>	Chapter 2 – Population growth, health and wellbeing	With regard to Chapter 2, paragraph 2.49 sets out the sustainability issues and highlights the opportunities for the Local Plan to manage such issues. The new Local Plan has yet to be drafted. The first bullet references pressures on key services and facilities, including health and social care and highlights the opportunity the new Local Plan presents to manage these pressures. The last bullet references capacity issues in the District's primary schools and highlights the need to meet local needs through improvements to existing facilities and infrastructure. This is likely to include expansions and improvements to existing facilities and new facilities. Both apply to everywhere in the District.
<p>With regard to education capacity issues in the District, expansion is unlikely to address the increased education need because it will extend the travel time for students in rural communities, as well as increasing the need for them to use private transport due to a lack of sufficient public transport.</p>	Chapter 2 – Population growth, health and wellbeing – paragraphs 2.32 and 2.49 (bullet point 7)	With regard to paragraph 2.32, the paragraph describes Kent County Council's strategy.

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This paragraph states that the Local Plan will 'improve the prosperity of the rural economy'. Could there be consideration of also improving the sustainability of rural employment?	Chapter 3 – Economy – paragraph 3.18	With regard to paragraph 3.18, the word 'sustainability' has been added to the first bullet.
No reference is made to Manston Airport.	Chapter 4 – Transport connections and travel habits – paragraph 4.6	With regard to paragraph 4.6, the document 'Lighting the way to success: The EKLSP Sustainable Community Strategy' does not discuss Manston Airport in detail. The SA Scoping Report does, however, include a short discussion on Manston Airport in paragraph 2.48. An additional reference has been added to Chapter 4.
No mention of how rural transport can be supported. Furthermore, this issue is not mentioned later in the Report, in relation to rural communities coping with their ageing populations and the decline of public transport.	Chapter 4 – Transport connections and travel habits – paragraph 4.10	With regard to paragraph 4.10, paragraph 4.27 makes direct reference to the elderly becoming increasingly reliant on local bus services and the need to ensure a good range of sustainable transport links are provided across the District – this includes rural areas.
Ash Parish Council would like to comment on the historic evidence base regarding Anglo-Saxon burials/finds in Ash (if appropriate) at a later point in the coming consultations. They would also like to include detail on the Richborough Fort in their comment(s).	Chapter 8 – Historic environment – paragraph 8.15	Ash Parish Council's wish to comment on the historic evidence base regarding Anglo-Saxon burials/finds and Richborough Fort is noted.
Environment Agency		
The phrase "a shortfall in demand" would sound better as "a shortfall in supply relative to demand".	Chapter 5 – Air, land and water quality – paragraph 5.40	With regard to paragraphs 5.40 and 5.47 (bullet point 4), the paragraphs have been amended as suggested.
Same as above.	Chapter 5 – Air, land and water quality – paragraph 5.47	With regard to paragraphs 5.40 and 5.47 (bullet point 4), the paragraphs have been amended as suggested.
With regard to the sentence "Some areas within the Dover District have been classified by the Environment Agency as at Moderate or Serious Water Stress", this is true of individual water bodies, but water companies are able to move water around their networks so that the status of individual water bodies is only indirectly relevant to supply. Water companies across the whole of south-east England (including Affinity and Southern Water) have been classified as under Serious Water Stress ⁷ , Table 1 of	Chapter 5 – Air, land and water quality – paragraph 5.41	With regard to paragraph 5.41, the paragraph has been updated accordingly.

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https://www.gov.uk/government/publications/water-stressed-areas-2013-classification .		
<p>With regard to the sentence “Source Protection Zones 2 and 3 are located within the District”, there are also Zones 1, which are the most sensitive. These protection zones are designated to protect sources of supply rather than “rivers and aquifers” from pollution.</p>	Chapter 5 – Air, land and water quality – paragraph 5.46	With regard to paragraph 5.46, the paragraph has been reworded to include reference to Source Protection Zone 1, and the role Source Protections Zones play in protecting the District’s water supply from pollution.
<p>The intention to “minimise the amount of inappropriate development” in these zones sounds insufficiently strong.</p>	Chapter 5 – Air, land and water quality – paragraph 5.47	With regard to paragraph 5.47 and associated appraisal question SA 5.4, both have been reworded to direct inappropriate development away from Source Protection Zones.
<p>Supporting Appraisal Question SA 5.4 (Tables 5.1 and 10.1) – Same as above.</p>		With regard to paragraph 5.47 and associated appraisal question SA 5.4, both have been reworded to direct inappropriate development away from Source Protection Zones.
<p>This objective should make it clear that development should be avoided in flood risk areas. The Environment Agency suggests the following wording: “To avoid placing people and property in areas of flood risk. Where, exceptionally, it is necessary it must be safe without increasing flood risk elsewhere, taking into account the impact of climate change” and “SA 9.1: Does the Plan avoid adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?” The Environment Agency questions the sufficiency of this question, given that ‘adverse effects’ are bound to come from development and use of sites. They suggest that reference should be made to the mitigation or offsetting of harm when unavoidable harm is likely to occur.</p>	SA Objective 7 (Tables 10.1)	<p>With regard to SA Objective 7, Supporting Appraisal Question 7.1 has been amended to read: ‘Does the Plan avoid placing people and property in areas of flood risk, or where it exceptionally does, is it safe without increasing flood risk elsewhere, taking into account the impact of climate change?’</p> <p>With regard to SA Objective 9, Supporting Appraisal Question 9.1 has been amended to read: ‘Does the Plan avoid, mitigate and offset adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?’</p> <p>With regard to Supporting Appraisal Question 9.3, reference has been made to Kearsney Abbey, Russell Gardens and Bushy Ruff because the Green Infrastructure Strategy identifies their importance (and appeal) to the public. However, it is noted that other sites may be of equal importance. Therefore Supporting Appraisal Question 9.3 has been revised to read: ‘Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations’.</p>
<p>The following watercourses have been excluded from this section: the North Stream, South Stream, Delf, Penfield Sewer, Brook Stream and the Minnis</p>	Chapter 5 – Air, land and water quality – paragraph 5.38	With regard to paragraph 5.38, the paragraph has been amended to include reference to all main rivers.

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Sewer. The Environment Agency questions whether there is some confusion over the meaning of 'main river'. Clarification required.		
'Fowlmean County Park' should be 'Fowlmead Country Park'. Lastly, from a groundwater and contaminated land perspective this document covers the key aspects for the Environment Agency, including brownfield site developments and capacity in sewer systems, especially around Whitfield.	Chapter 7 – Biodiversity – paragraph 7.25	With regard to paragraph 7.25, the paragraph has been amended.
Highways Agency		
Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the SRN covering Dover District, namely the A2 and A20. Highways England support SA Objective 4, namely "To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion". Highways England supports the fact that the sites will be considered cumulatively, as well as in their own right. Lastly, Highways England notes that they wish to work with DDC regarding the production of the necessary evidence base. They stand ready to provide assistance and commentary throughout the process.	SA Objective 4 (Tables 10.1)	Noted.
Historic England		
We are content that the Scoping Report for Dover adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the local plan. This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may	General comment	Noted.

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subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.		
Kent County Council		
Reference should be made to the Kent Design Guide , with a focus on section 1.4 ('Sustainability').	Chapter 4 – Transport connections and travel habits	With regard to Chapter 4, reference has now been made to the Kent Design Guide, with a focus on section 1.4.
<p>With regard to minerals safeguarding, KCC notes that the Scoping Report correctly acknowledges the safeguarded minerals present within the District, as outlined in Policy CMS 5 of the adopted Kent Minerals and Waste Local Plan (KMWLP). It also makes appropriate reference to the NPPF and the KMWLP with regard to ensuring that mineral resources are not needlessly sterilised by other forms of development, whilst also correctly identifying the valuable safeguarded minerals reserves.</p> <p>With regard to waste management facilities, the Scoping Report recognises the importance of waste management facilities and ensuring that their continued lawful operation is not compromised by future development, as outlined in Policy CSW 16 of the KMWLP. The Scoping Report also correctly recognises that waste management facilities are important to maintaining net self-sufficiency and ensuring that development is sustainable. KCC considers that the approach to sustainable waste management is in accordance with the sustainable waste management and waste facility safeguarding objective of the KMWLP.</p> <p>Overall, KCC is satisfied with the inclusion of minerals and waste facility safeguarding within the Scoping Report. The approach is in accordance with the principles of sustainable waste management, facility safeguarding, mineral safeguarding and sustainable supply objectives of the KMWLP.</p>	Chapter 5 – Air, land and water quality	KCC's support for Chapters 5 and 6 is noted.
KCC notes that the Scoping Report includes an appropriate assessment relating to flood risk. The Scoping Report also appropriately notes that the assessment is site specific and indicates that sustainable drainage systems may be implemented on a site by site basis during planning application processes.	Chapter 6 – Climate change adaptation and mitigation	KCC's support for Chapters 5 and 6 is noted.

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<p>KCC recommends the following text is added to the 'International' section: "Valletta Treaty (1992): Formerly the European Convention on the Protection of the Archaeological Heritage (Revisited). Aims to protect the European archaeological heritage 'as a source of European collective memory and as an instrument for historical and scientific study'".</p> <p>With regard to the 'National' section, KCC acknowledges that the proposed revisions to the NPPF have now been published.</p> <p>With regard to the 'Sub National' section, KCC recommends the inclusion of the following paragraph: "The Kent Environment Strategy (2016): Seeks to build on the previous Environment Strategy to learn from experience, evaluate progress, bridge gaps in knowledge and deliver activities that have positive benefits for the environment, health and the economy".</p> <p>With regard to the 'Current baseline' section, the text only refers to designated heritage assets. However, as the Dover Heritage Strategy already acknowledges, the vast majority of Dover's heritage assets are not designated (at the time of publication of the Dover Heritage Strategy more than 6,000 non-designated assets were identified). Some of these will be of similar significance to the designated assets. Indeed the non-designated assets produce most of the District's historic character and include many of the assets most valued by local people. KCC therefore recommends that the Scoping Report should include a section on Dover's non-designated assets, to include: (1) archaeological sites and features; (2) historic buildings; (3) the historic landscape; and (4) maritime features.</p> <p>The inclusion of non-designated sites is particularly important and indeed, this is evident from the prominent focus in the draft appraisal questions.</p> <p>The text should also mention the Kent Historic Environment Record (HER) maintained by KCC. This is the main source of baseline information on Kent's heritage assets, both designated and non-designated.</p> <p>A key source of baseline heritage information could be the Local List of Heritage Assets that was proposed to be compiled as a recommendation of the Dover Heritage Strategy.</p>	<p>Chapter 8 – Historic environment</p>	<p>With regards to Chapter 8, reference to the Valletta Treaty and the Kent Environment Strategy has now been added. The 'Current baseline' section in Chapter 8 has also been updated to include reference to non-designated heritage assets and KCC's Historic Environment Record. Where possible, all site options have been assessed by Council officers to determine the likely effects of development on significance and setting of designation and non-designated historic assets, including historic assets at risk.</p>

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<p>For any proposals located within farmsteads, the County Council recommends reference is given to the recent farmstead guidance prepared by Historic England and the Kent Downs AONB Unit.</p>		
<p>Chapter 5 Chapter 9 – KCC notes that, at present, this section does not describe the historic nature of the Dover landscape. KCC recommends that DDC refers to the Kent Landscape Assessment , which includes a broad consideration of the history of the landscape. However, to fully comprehend how the landscape has developed and to identify those aspects which make it unique, a more detailed assessment is needed. The Kent Historic Landscape Characterisation (2001) is a tool for understanding this historic context and should be used at a strategic level to inform decisions taken regarding the landscape character of Dover. Ideally this county level study should be deepened to be more relevant at the District and local level (KCC is happy to discuss further with DCC as to how this can be taken forward).</p> <p>The Kent Historic Landscape Characterisation should be mentioned in this review of baseline landscape information. It is difficult to address the heritage aspects of the Supporting Appraisal Questions (11.1 and 11.2) if this information is not included.</p>	<p>Chapter 9 – Landscape</p>	<p>With regard to Chapter 9, reference is already made to the Kent Landscape Assessment. Reference to the Kent Historic Landscape Characterisation Report has, however, been added to the chapter. As mentioned in the Report, the District is in the process of updating its Landscape Character Assessment to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.</p>
<p>Heritage assets include non-designated heritage assets, as stated in the Dover Heritage Strategy (paras 2.1, 3.5 and 3.6). As such, KCC suggest that the 'Assessment Note' for these criteria be modified to the following: "Heritage assets include Scheduled Monuments, Protected Wreck sites, Battlefields, Listed Buildings Grades I and II*, Registered Parks and Gardens Grade I and II*, World Heritage Sites, Conservation Areas and non-designated heritage sites".</p> <p>Further, using proximity to heritage assets as a screening mechanism for site allocations will only address some heritage issues. It is true that archaeological remains are less likely to be affected as distance to the development increases, but the setting of heritage assets can nonetheless be significantly affected even at a distance. The text identifies this to some extent, but suggests that longer screening distances will only be needed outside existing settlements. In reality, some of Dover's most important assets, such as Dover Castle or the District's historic churches, are located in urban areas and could be impacted negatively by poorly designed, large or</p>	<p>Table A1.2 – Environmental Site Assessment Criteria</p>	<p>With regard to the site assessment criteria set out in Table A1.2, the criteria facilitate an initial high-level assessment of site options but have been supplemented by Council assessments where possible.</p>

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<p>tall developments. The site assessment criteria defined in Table A1.2 therefore needs to include a more explicit requirement that new development will not impact negatively on the setting of heritage assets.</p> <p>It should also be noted that as part of the Dover Heritage Strategy all the site allocations were assessed for their relevance against the heritage themes in the Strategy. This assessment should be considered as part of the more general site assessment proposed in this report.</p>		
Kent County Council Public Rights of Way (PROW) and Access Service		
<p>With regard to the 'Policy Context' sections throughout this report, reference should be made to the Rights of Way Improvement Plan (ROWIP), which aims to address the future needs of Kent's PROW users through the delivery of a range of actions over the next decade. The vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. The inclusion of a reference to the ROWIP will enable the successful joint partnership working to continue to make improvements to Dover's PROW network. Joint delivery of the strategic plan will ensure significant benefits whereas its omission could result in significant loss of access to additional funding and opportunities.</p>	Policy context	The policy context sections to Chapters 2 and 4 have been updated to include reference to the Kent ROWIP.
<p>Para 2.42 – This paragraph does not make reference to the England Coast Path or the existence of Coastal Access rights within the District. The England Coast Path is a new National Trail walking route that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. Following the introduction of the Marine and Coastal Access Act 2009, the County Council has been working in partnership with Natural England to establish the Kent stretches of the England Coast Path.</p> <p>The Service also notes the importance of protecting and enhancing public rights of way and access with regard to future site allocations included within the Local Plan.</p>	Chapter 2 – Population growth, health and well-being	With regard to paragraph 2.42, the paragraph has been updated to include reference to the England Coast Path and access rights.
The Coal Authority		

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There are 19 recorded mine entries within the Dover area. The Coal Authority therefore recommends that a criterion is included within the assessment framework that reviews the area under consideration against the Coal Authority's downloadable data, which identifies those areas within Dover that are at risk from past coal mining activity. This would ensure that any coal mining features present on a site which may impact the developable area, are identified at an early stage.	Table A1.2 – Environmental Site Assessment Criteria	A new site assessment criterion has been added to take account of Coal Authority 'mine entries', which will inform the SA of site allocation options.

Table A.2: Representations on Draft Dover Local Plan SA Report

Consultation Comment	SA Report Reference	Response/Action Taken
SA23 (Natural England)		
We advise that the following is revised: "SA 9.1: Does the Plan avoid, mitigate and offset adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?" We advise that the term offset should be removed.	Chapter 3 – SA framework	SA Objective 9.1 edited.
We advise that biodiversity net gain targets are included to provide evidence of a measurable uplift in biodiversity through the execution of the Local Plan.	Appendix B – Biodiversity policy context	Reference to draft national biodiversity net gain target added.
We further advise that water use targets in line with our recommendations above are included in the SA.	Appendix B – Biodiversity policy context	Reference to future national water use target added.
SA25 (Historic England)		
We are content that the sustainability appraisal report for Dover local plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	General comments	Noted.
DLP1539 (Environment Agency)		

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D5 reiterates the shortfalls in demand to 2031.	Table 3.1 – Key sustainability issues	Noted.
Appendix B para B.145 reiterates the statistics from the outdated Kent Environment Strategy.	Appendix B – Water quality	The most up to date evidence available was relied on in the production of Appendix B. The references and associated facts and figures in Appendix B will be updated through subsequent iterations of the SA.
The reasoning behind the domestic water efficiency standard – presented in paras 6.84-6.87 is well argued.	Chapter 6 – SA of water efficiency policy options	Noted.
DLP1819 (Highways England)		
Strategic highway infrastructure policy option B is likely lead to a situation where other development coming forward, not allocated, would be exempt from contributions (Para 6.413). Highways England is supportive of this policy towards the A2 and will work with Dover Council as part of the RIS3 programme for improvements on the A2.	Chapter 6 – SA of transport and infrastructure policy options	The Council has elected to include a policy supporting upgrades to the A2 because it represents the option which is likely to yield the greatest financial support for the strategic infrastructure project.
With regards to Highway network and safety, the Council has chosen to focus on a flexible approach to Transport Assessments and Travel Plans in order to force the onus on developers to prove their management of the highway network and overall impact. Highways England agrees with the flexible approach indicated in Option A and chosen within the DDLP.		Noted.
The Council is not seeking to introduce CIL as a financial obligation, but proceed with utilising existing S106 and S278 Agreements as mechanisms for collecting developer contributions. Highways England agrees with this approach.		Noted.
With regards to the Strategic Highways Infrastructure, the SA notes in para 6.407 that the Council considered three options. Option A was selected as it was likely to offer the greatest financial support for upgrades to the A2 as a strategic infrastructure project. Assessment by both Dover Council and Highways England will provide the final test of the proposals and determine appropriate mitigation needs. For this reason, Highways England is confident		Noted.

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<p>that the potential negative effects of the DDLP policies can be effectively managed throughout the life cycle of the plan.</p>		
<p>With regards to Sustainable Travel and the policies outlined within the DDLP, the SA notes that while sustainable travel is encouraged and supported in the DDLP with improved connection for public transport and active travel (cycling and walking), a minor adverse effect is also recorded for improvements on the SRN. Improvements to the SRN are likely to increase capacity and improve journey time reliability, which by their very nature, may attract more private vehicle use vs lowering overall car use. This is an accepted side effect of improvements to any road network and as such is not considered to have a significant impact. What is more important is that the attractiveness of the public transport modes and active cycle/walking links are designed in such a way as to make the choice of a car the last consideration. Prioritising other modes over that of the vehicle is likely to encourage a significant mode shift. As such, Highways England has no concerns with regards to how sustainable travel is managed within the DDLP.</p>	<p>Chapter 6 – Secondary, cumulative and synergistic effects</p>	<p>The minor negative effect recorded for SA Objective 4 (sustainable travel) is acknowledged in recognition of the fact that a significant number of homes (1,875) were to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Draft Local Plan's focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available. This judgement also acknowledges that considerable investment in the strategic highway network is planned over the Plan period.</p>
<p>SA12, SA13 (Campaign To Protect Rural England (CPRE))</p>		
<p>D3 sets out that the Plan provides an opportunity to set out measures to mitigate exceedances in the AQMAs without inhibiting the need for the District to grow. It will be important that allocations, both individually and cumulatively, do not increase air pollution resulting in the need for the establishment of new AQMA.</p>	<p>Table 3.1 – Key sustainability issues for Dover District</p>	<p>Noted. It is considered that this issue is covered through the existing wording.</p>
<p>E4 notes that the District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Whilst adaptation and mitigation will be part of the solution the location of new development can either help or hinder. The SA should recognise that a sustainable pattern of development will also help address the climate change challenge. The sustainability framework (Table 3.2) should be enhanced to</p>		<p>Additional wording added to Tables 3.1 and 3.2 to reference the importance of a sustainable pattern of development in combating climate change.</p>

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ensure that the Plans location of new development supports a sustainable pattern of development for existing and future residents.		
SA24 (Southern Water)		
<p>Southern Water have commented that the following points in the Sustainability Appraisal look to highlight foul capacity issues in the Dover District Area (4.77, B.154, C.92, C.94, C.95, C.103). In respect of the above statements, Southern Water are currently carrying out a project in Whitfield to overcome the foul issues that would be caused by increased housing during the timeline of the Local Plan. The aim of the project is to provide storage upstream of Sandwich Road pumping station that will prevent the flooding of the local properties. The flooding of local properties has occurred since 2014 and has recently been exacerbated by the new development in the area as mentioned in the paragraphs noted above. At the time the project was prepared, the area in Whitfield was projected to experience growth of 5,750 properties by 2035, taking the overall number of properties draining to Sandwich Road pumping station to 7,453. We have calculated as part of the project that 1,200m³ of storage will be required for these 7,453 properties to prevent further flooding of the network. This storage has taken the form of a shaft, and it is intended that this storage will then be converted into an oversized wet well for a long term solution which consists of pumping approximately 12km to Broomfield Bank WTW. Therefore the foul network should not be seen as a blocker to development in the Whitfield area and Southern Water would request for this to be noted within the draft sustainability report.</p>	Appendix B – Water quality	Reference to Southern Water’s work at Whitfield has been added to 4.77, Appendix B and C.
DLP3569 (Savills)		
<p>There are a number of areas of the SA that we consider flawed as there is limited information available to detail how the site has been assessed against each criteria. Further detail is therefore required to outline how the SA corresponds with the draft strategic or development management policies. Savills has provided comments on the SA, in relation to the promotion at the Land east of Northbourne Road in the context that the present version applies to the reduced allocation set out within GTM003, rather than the entirety of the promoted site. These comments should be considered as part</p>	Site GTM003 SA findings.	<p>Justification for effects identified for the site at Great Mongeham can be found in paragraphs 5.36 and 5.38 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site option has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary</p>

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<p>of any revision to the SA, should the allocation be expanded across the wider site.</p> <p>The SA States that the proposal will result in significant adverse impacts to resources, as well as minor negative effects to the Historic Environment, Climate Change, Transport and Access to Amenities. This is not considered justified as there are multiple ways to ensure or mitigate these impacts, which have not yet been accounted for in the SA.</p> <p>In accordance with this, Table 4.2 sets out the proposed changes to the SA findings as suggested by Savills and following the production of further technical work.</p> <p>The SA does not account for the relative sustainability of the site, specifically when considering its close proximity to local bus services and the wider Great Mongeham settlement.</p> <p>The proposed SA findings demonstrate the potential benefits of the wider proposal on each objective, including the potential for biodiversity net-gain across the site and the use of renewable technology on the site to promote resilience across the site. As such, it is considered that the proposal will be able to enhance the baseline levels on the site.</p> <p>Comments made in the SA on site GTM003 are not justifiable as all can be mitigated against.</p>		<p>judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>Site GTM003 has been allocated in the Draft Local Plan Site Allocations Policy 1: Housing Allocations, which contains reference to appropriate mitigation measures. The significant effects of Site Allocations Policy 1 are set out in Table 6.4 of the SA Report. Accompanying justification for the effects identified are set out in paragraphs 6.183 to 6.245.</p> <p>Paragraph 6.248 states with regards to the significant negative effects identified for SA Objective 5 (natural resources), as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further. Similarly, other potential environmental adverse effects identified against SA Objectives 2 (health and well-being), 4 (travel) 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations.</p> <p>Table 6.11 of the SA Report summarises the negative effects that could arise from the implementation of the individual Draft Local Plan policies in relation to each SA objective and how these are likely to be mitigated by other policies in the Draft Local Plan.</p> <p>Further information with regards to the appraisal of each site option will be provided in the SA Report accompanying the Publication Local Plan.</p>
SA28 (Barratts)		
<p>Of the options considered, Barratt consider DDC should proceed with spatial options A, B or E whereby development is distributed more evenly across the district in areas on suitable and achievable sites that can be delivered in areas where new homes and infrastructure is required. This is preferable to the proposed approach within the Regulation 18 Local Plan which seeks to continue a focus of development in Dover Town. It is also recommended that DDC seek to maximise growth and move forward with an ambition to deliver the highest growth option to boost significantly housing in accordance with</p>	<p>Chapters 4 and 6 – Growth/spatial options SA</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial</p>

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<p>NPPF paragraph 59. Recommendation: DDC proceed with spatial options A, B or E and seek to deliver the highest growth option.</p>		<p>options had not been defined at this stage in the plan-making and associated SA process.</p> <p>Paragraph 6.143 sets out the councils reasoning behind the selection of the preferred housing growth option: The minimum objectively assessed housing needs of the District in line with Growth Options 1 or 2 using a spatial strategy guided by the District's settlement hierarchy (Spatial Option C) but also avoiding the District's key environmental constraints (Spatial Option D). To ensure deliverability the spatial strategy is also influenced by site availability (Spatial Option A). This combination of growth and spatial options is considered to be consistent with the guidance set out in the Strategic Housing Market Assessment (2017) which concludes that a cautious approach is needed to the housing target unless significant economic interventions, such as regeneration.</p>
<p>SA3 (Member of the Public)</p>		
<p>RIN004, on the former Ringwoud Alpines site, and the associated RIN002, have both been incorrectly described in the HELAA as brownfield/part brownfield historically. Furthermore, site RIN004 should be record as lying within the Kent Downs AONB, and that a traffic assessment would be required. It seems there has been an error or accidental omission as these points, as these are now missing from the current Site Allocations Policy 1 Non-Strategic Housing Allocations. This should be corrected.</p>	<p>Site RIN002 and RIN004 SA findings.</p>	<p>The SA of site options against SA objective 5 (Resources) focusses on the agricultural land classification of land and its environmental quality rather than its greenfield or brownfield status. The SA of site options against SA objective 11 (Landscape) draws on the Council's HELAA Landscape Environment Assessment – Landscape sensitivity Assessment. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p>
<p>SA8, SA9 (Member of the Public)</p>		
<p>Table 4.2 incorrectly assesses the impact of growth scenario C. Each category needs to be reassessed to accurately reflect detrimental impact of this growth option.</p>	<p>Table 4.2 – Growth/spatial options SA findings</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial options had not been defined at this stage in the plan-making and associated SA process.</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>Table fails to correctly assess the impacts of the development of sites EAS002 and EAS012 on Travel, Employment, Health and Wellbeing, Air Pollution and Natural Environment. Reassessment is required to take account of these impacts.</p>	<p>Table 5.4 – Eastry residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Eastry can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>SA11 (Member of the Public)</p>		
<p>Objection to further housing growth in Deal. Sites DEA020 and DEA008 are identified as remote options in the Plan, but in the same breath these sites are put forward for consideration. The weakest performing site options are located in generally the remotest locations south of Walmer (WAL002) and west of Sholden (DEA020 and DEA008) where there is generally greater scope for significant adverse effects on the Districts environment. I would request, these sites are removed from the plan.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>SA16, SA17, SA18, SA19 (Member of the Public)</p>		
<p>Objection to the allocation of site SHE003 on the grounds of A) Impact on narrow lanes, particularly those without pavements on Westcourt Lane and Church Hill. B) More traffic congestion. Traffic will also be aggravated by major developments in Eythorne/Elvington. C) Inadequate access points to new sites and especial problems for emergency vehicle access. D) Impact on natural habitats for flora and insects as well as roadside nature reserves. E) Increased risk of flooding F) Harm to villages local distinctiveness and quality of life. G) Lack of infrastructure for schooling and access to GPS H) Characterisation of Shepherdsweil in the same settlement hierarchy as</p>	<p>Table 5.4 – Shepherdsweil with Coldred residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Shepherdsweil with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of</p>

Consultation Comment	SA Report Reference	Response/Action Taken
<p>Wingham, St Margarets and Ash, villages with considerably more facilities. I) Failure of DDC to give communities adequate time to consider the plan with the eight weeks consultation taking place in a pandemic lockdown.</p>		<p>development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>Objection to the allocation of site SHE004 on the grounds of A) More traffic and congestion problems in the village B) Inadequate access points to new site and problems for emergency vehicle access C) Harm to villages local distinctiveness and quality of life D) Harmful impact on landscape and appearance of countryside. Damage to distinctive and unique views across east Kent. Development close to North Downs Way, much used by walkers, which provides villagers particularly young, older people and dog walkers safe access to the countryside without danger from vehicles E) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes, especially those without pavements on Cox Hill. Increased danger to pedestrians and cyclists. B) More traffic and congestion. C) Impact on natural habitats, roadside nature reserves, flora and insects. D) Increased risk of flooding. E) Harm to villages quality of life. F) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes B) More traffic and congestion C) Inadequate access points to new site D) Impact on natural habitats for flora and insects and nature reserve E) Harm to villages local distinctiveness and quality of life F) Failure of DDC to give communities adequate time to consider the plan during a pandemic lockdown.</p>		
<p>SA20 (Member of the Public)</p>		
<p>With regards to DM Policy 11, the consultee raises that existing developments in the District is of the same bland design. Local Plan should promote more sustainable housing developments that offer exciting environmentally sensitive designs. Local Plan should require all new housing</p>	<p>SA of DM Policy 11 (Type and Mix of Housing)</p>	<p>A record and appraisal of the reasonable alternatives considered for DM Policy 11 can be found in paragraphs 6.159-6.162. The reasons for the selection of the preferred option can be found in paragraph 6.163. Table 6.4 sets out the likely effects of DM Policy DM 11. Justification for the two</p>

Consultation Comment	SA Report Reference	Response/Action Taken
to be built to the governments proposed 2025 Green Standards as a minimum.		significant positive effects identified can be found in paragraphs 6.184 and 6.197.
SA22 (Member of the Public)		
<p>Objection to the allocation of sites in Sheperdswell, in particular SHE003. The objection cites a number of sustainability issues that make the sites unsustainable: The infrastructure and road network in the village will not be able to cope with additional housing. The roads are si-gle width country lanes – totally unsuitable for the massive increase in traffic from 100+ new homes. There are no footpaths and no possibility or space for any. Very dangerous and the plans do not address this in any way. Poor access to public transport, will lead to congestion. Water and sewage systems are also cited as under pressure. Suggests alternative locations where there is the road, water, education and health infrastructure to accommodate growth.</p>	Table 5.4 – Shepherdswell with Coldred residential site options SA findings	<p>Justification for effects identified for the sites options in and around Shepherdswell with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA5 (Member of the Public)		
<p>Objection to the allocation of site WAL002 on the grounds that the gas network is problematic, the drains block regularly and the Glenn road is not suitable for more traffic.</p>	Table 5.2 – Deal residential site options SA findings	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA15 (Member of the Public)		
<p>Objection to the allocation of site WAL002 on the grounds that A) This is an area of great natural beauty and the development would seriously damage the landscape and wildlife habitats in the area. B) This land only has one road leading to it and has flooded in the past.</p>	Table 5.2 – Deal residential site options SA findings	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p>

Appendix A
SA Consultation Comments

Publication Dover District Local Plan (Reg 19)
September 2022

Consultation Comment	SA Report Reference	Response/Action Taken
		<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA21 (Member of the Public)		
<p>The consultee suggests the spatial options should take into account whether an area has reached its maximum housing figure, advocating that is not always reflected in a population based approach. Opposed to further rural housing growth on the grounds that A) Existing infrastructure cannot cope with additional housing, B) Impact on tourism – adding more housing to existing villages will destroy the rural image tourists enjoy for walking and cycling.</p>	<p>Definition of reasonable spatial options for SA – Paragraph 4.27</p>	<p>The spatial options identified have been defined based on a general assumption that additional growth will be supported by new and improved infrastructure, services and facilities to accommodate the existing and future needs of communities.</p>
SA26 (Member of the Public)		
<p>Table 5.2 Deal residential site options SA Findings (Chapter 5): Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b, SA6, SA3.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>
SA27 (Member of the Public)		

Consultation Comment	SA Report Reference	Response/Action Taken
<p>Table 5.2 Deal residential site options SA Findings (Chapter 5) Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b,SA6,SA3.</p>	<p>Table 5.2 – Deal residential site options SA findings</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix C. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>