

Appendix B

Detailed Sustainability and Policy Context

Population growth, health and wellbeing

Policy context

International

B.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998): establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002): sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

National

B.3 National Planning Policy Framework (NPPF) (2021)¹ contains the following:

- The NPPF promotes healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles.
- One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”.
- Local plans should “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.
- “A network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”.
- “Good design is a key aspect of sustainable development” and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. Planning decisions should result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raises the standard more generally in the area, and addresses the connections between people and places.
- The promotion of retaining and enhancing of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
- Developments should create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.
- There is a need to take a “proactive, positive and collaborative approach” to bring forward development that will “widen choice in education”, including sufficient choice of school places.
- Paragraph 73 states that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities”. As such the NPPF provides support for the identification of locations which are suitable for this type of development in a manner which would help to meet needs identified in a sustainable way.

¹ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

B.4 The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book**² provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation

B.5 National Planning Practice Guidance (NPPG) (2021)³: contains the following: Local planning authorities and relevant organisations should engage to improve health and wellbeing, and so the provision of health infrastructure is considered in local and neighbourhood plans and in planning decision making.

B.6 National Design Guide (2021)⁴: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.7 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013)⁵: warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.8 Fair Society, Healthy Lives (2011)⁶: investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities". **Marmot Review 10 Years On (2020)**⁷ revisits Fair Society, Healthy Lives. It found that, since 2010, life expectancy in England has stalled, which suggests society has stopped improving. In addition, there are marked regional differences in life expectancy – the more deprived the area, the shorter the life expectancy. Mortality rates are increasing in those aged 45-49, child poverty has increased and there is a housing crisis and rise in homelessness.

B.9 Planning Policy for Traveller Sites (2015)⁸: sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community

B.10 Planning for the Future White Paper (2020)⁹: sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them.
- Digitising plan-making and development management processes.
- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

² Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2018). Housing Delivery Test Measurement Rule Book. (see <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>)

³ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2022). National Planning Practice Guidance. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

⁴ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

⁵ Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>)

⁶ The Marmot Review (2011). Fair Society, Healthy Lives. (see <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>)

⁷ Institute of Health Equity (2020). Health Equity in England: The Marmot Review 10 Years On. (see <https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on>)

⁸ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2015). Planning policy for traveller sites. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

⁹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2021). (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

B.11 The Levelling Up and Regeneration Bill (2022)¹⁰ sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.

B.12 Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.13 Laying the foundations: a housing strategy for England (2011)¹¹: aims to provide support to deliver new homes and improve social mobility.

B.14 Homes England Strategic Plan 2018 to 2023 (2018)¹²: sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.15 The Housing White Paper 2017 (Fixing our broken housing market) (2017)¹³: sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

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

B.16 Public Health England, PHE Strategy 2020-25 (2019)¹⁴: identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

¹⁰ Department for Levelling Up, Housing and Communities (2022). White Paper Levelling Up the United Kingdom. (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

¹¹ HM Government (2011). Laying the Foundations: A Housing Strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf)

¹² Homes England (2018) Strategic Plan 2018 to 2023. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf)

¹³ Ministry of Housing, Communities and Local Government (2017). Fixing our broken housing market. (see <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>)

¹⁴ Public Health England (2019). PHE Strategy 2020-25. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

B.17 Healthy Lives, Healthy People: Our strategy for public health in England (2010)¹⁵: sets out how our approach to public health challenges will:

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

B.18 A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹⁶: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

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

B.19 Build Back Better: Our Plan for Health and Social Care (2021)¹⁷: sets out the government’s new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government’s plan to introduce a new Health and Social Care Levy.

B.20 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)¹⁸: sets out the Government’s plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

¹⁵ HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

¹⁶ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

¹⁷ Department of Health and Social Care and Cabinet Office (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

¹⁸ Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

B.21 The Charter for Social Housing Residents: Social Housing White Paper (2020)¹⁹: sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.22 Using the planning system to promote healthy weight environments²⁰ (2020), **Addendum (2021)**²¹ provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.23 Build Back Better: Our Plan for Health and Social Care (2021)²² sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.24 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)²³ sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

B.25 A fairer private rented sector White Paper (2022)²⁴ aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

Sub-national

B.26 Kent Joint Health and Wellbeing Strategy (2014)²⁵: outlines how Kent County Council seeks to improve people's health and reduce health inequalities in the county. The strategy has four key priorities:

- Tackle key health issues where Kent is performing worse than the England average.
- Tackle health inequalities.
- Tackle the gaps in provision.
- Transform services to improve outcomes, patient experience and value for money.

B.27 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)²⁶: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

¹⁹ Ministry of Housing, Communities and Local Government (2020). The charter for social housing residents: social housing white paper. (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper#full-publication-update-history>)

²⁰ Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>)

²¹ Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

²² Department of Health and Social Care and Cabinet Office (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

²³ Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

²⁴ Department for Levelling Up, Housing and Communities (2022) A fairer private rented sector (see <https://www.gov.uk/government/publications/a-fairer-private-rented-sector/a-fairer-private-rented-sector#executive-summary>)

²⁵ Kent County Council (2014). Kent Joint Health and Wellbeing Strategy. (see https://www.kent.gov.uk/data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf)

²⁶ Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see https://www.kent.gov.uk/data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

- Ageing population challenging healthcare and local community services.
- New schools and school expansions required to support growth aspirations.
- Implications and uncertainties regarding post-Brexit border control management.

B.28 The GIF summarises the need for future infrastructure projects in Dover, including major housing developments (Dover Port, Town Centre and Seafront, Whitfield and Discovery Park in Sandwich).

B.29 East Kent Growth Framework (2018)²⁷: sets out an overarching strategic approach for identifying investment priorities to achieve long-term economic growth across East Kent between 2017 and 2027. The Framework incorporates the five East Kent Districts of Ashford, Canterbury, Dover, Folkestone and Hythe and Thanet. There are four key objectives:

- Unlocking growth through infrastructure – identified sites for development need supporting transport and digital infrastructure, particularly targeted upgrading and making better use of road and rail networks (particularly High Speed 1) to enhance domestic and international connectivity while enabling local accessibility.
- Delivery of business space – the next-generation of modern commercial space for business start-ups, encouraging existing businesses to scale-up and helping attract new mobile investment into the area while driving forward the development of brownfield sites.
- Supporting skills and productivity within business – creating an environment for innovation in productivity improvements, supporting businesses to grow and move up the value chain, encouraging faster broadband, ensuring that businesses have the skills to grow and that the region’s skills base continues to improve, and is linked to the success of higher education and further education sectors creating talent.
- Place making and shaping –improving the perception of people’s idea of East Kent and make it a location of first choice that retains and attracts young people, families and entrepreneurs, while at the same time maximising the potential of the natural assets, enhancing town centres and ensuring a high quality built environment.

B.30 Of these four key objectives, unlocking growth through infrastructure is considered to be the most important and focuses on securing delivery of critical infrastructure projects, working with industry bodies and other bodies where necessary.

B.31 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)²⁸: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that “By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities”. By 2030:

- East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-target housing supply, and connections to London, the South East and Europe.
- There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.
- Outreach programmes will be used to promote opportunities for education in the community. They will help to raise people’s aspirations, increase their potential stake in local economic success and bring together groups that might otherwise be marginalised, including the elderly, ethnic minorities and those seeking to return to work.
- The current inequalities in prosperity, prospects and living conditions will have receded significantly.
- Imbalances in the health and life expectancy of East Kent’s citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and

²⁷ East Kent Regeneration Board (2018). East Kent Growth Framework (see <http://kmep.org.uk/news/info-page/east-kent-growth-framework-march-2018>)

²⁸ East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

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

B.32 Kent Rights of Way Improvement Plan (n.d.)²⁹: the vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. Notable improvements in Dover include the creation of a new England Coast path along the District's coastline and beyond, providing access to the coastline in accordance with the Marine and Coastal Access Act 2009 and upgrades to existing public footpaths associated with the Sholden development, providing access to local schools, Fowlmead Country Park and Deal town centre.

Current baseline

Population

B.33 Dover District contains the three towns of Dover, Deal and Sandwich and a large rural area with a great variety of villages including those associated with the former East Kent Coalfield. Mining activity and other industrial uses have left a legacy of isolated pockets of derelict and despoiled land in parts of the District which contrasts with the natural and historic beauty of the District. In 2020 the population of Dover was 118,500 people, the fourth smallest local authority population in Kent³⁰. The working age population of Dover was 69,500 people³¹.

B.34 In the future, over the period 2018-2043 the projections show that the population of Dover District will increase from 116,969 to 141,405 people. This is predominantly due to domestic migration flows, as natural change is negative (i.e. more deaths than births)³². However, it's important to note that as outlined in the 2021 Census, Dover's population increase (4.2%) is lower than the overall increase for England (6.6%) and the South East (7.5%). As of 2021, Dover is the 23rd least densely populated of the South East's 64 local authority areas³³. In 2021, the District ranked 206th for total population out of 309 local authority areas in England, which is a fall of five places in a decade (from 201st in 2011).

B.35 Nearby areas like Ashford and Thanet have seen their populations increase by around 12.5% and 4.8%, respectively, while others such as Canterbury saw an increase of 4.1% and Folkestone and Hythe saw smaller growth of 1.7%. The largest population increases in the South East have been in Dartford and Milton Keynes, where the populations have grown by 20% and 15.3%, respectively. At the other end of the scale, Gosport has seen a fall of 0.9%.

B.36 The ONS 2018 SNPP shows Dover District will attract nearly 14,921 new residents via migration over the period 2018-2028. Most of this migration is 'domestic' flowing from elsewhere in the UK³⁴.

B.37 Natural change will however continue to be negative, with the ONS 2018 SNPP projecting increases of about 14,156 deaths and 11,085 births between 2018 and 2028³⁵.

Gypsy, traveller and travelling showpeople

B.38 The updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment found that there is a need for a total of 42 pitches in Dover District between 2020 and 2040³⁶. However, if consideration is given to potential turnover and opportunities for additional capacity, this would result in a residual need for 4 pitches.

²⁹ Kent County Council. Kent Rights of Way Improvement Plan 2018-2028 (n.d.). (see https://www.kent.gov.uk/_data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf)

³⁰ NOMIS (2021). Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabrespop>)

³¹ NOMIS (2021). Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabrespop>)

³² ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojection/sforengland/2018based#change-by-regionprojections>)

³³ ONS (2021). Population change of selected local authority areas in the South East between 2011 and 2021. (see <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000108/>)

³⁴ ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojection/sforengland/2018based#change-by-region>)

³⁵ ONS (2020). Subnational population projections for England: 2018-based projections. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojection/sforengland/2018based#change-by-region>)

³⁶ Arch4 (2020) Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Housing.aspx>)

Housing

B.39 Dover District contains two urban areas (Dover and Deal), a market town (Sandwich) and a large number of villages. In general, Sandwich and the north of the District are the most expensive parts of Dover District, while Dover Town and the south of the District are the cheapest. Prices in Deal are notably cheaper than Sandwich, but more expensive than Dover Town³⁷. The mean price of dwellings in Dover District was £302,181³⁸ in June 2022, which is a 9% increase from June 2021 (£277,492). This is lower than the national (£304,867) and regional level (£390,513).

B.40 The 2021 Census showed that the number of households in Dover District increased by 4.5% since 2011, reaching 50,500 households in total. This compares to the national figure of 6.2%. In the District the number of households rose at a slower rate than households between 2001 and 2011³⁹.

B.41 The 2021 Census is currently being processed and therefore some data is not yet available and we have therefore retained reference to the previous 2011 Census. The 2011 Census showed that there were more single person households and few couple households with dependent children in the District than recorded regionally and nationally. A similar pattern has been shown by the more recent 2021 Census, which found there to be 3 million lone parent families, which accounting for 15.4% of families in the UK. Furthermore, over the period 2001 to 2011 the main change in household types was a growth in 'other' households, followed by lone parent households with no dependent children. However, the households with only non-dependent children increased while the number of households with dependent children decreased. This suggests that household formation rates amongst young adults may have reduced⁴⁰.

B.42 In Dover, District, there has been an increase of 23.9% in people aged 65 years and over, a decrease of 1.2% in people aged 15 to 64 years, and an increase of 1.1% in children aged under 15 years. This compares to an overall increase, in England, of 20.1% in people aged 65 years and over, 3.6% in people aged 15 to 64 years, and 5% of children aged under 15 years. The 2021 Census indicates that the largest increase in population in the District has been in people aged 70 to 79 and that the largest decrease has been in people aged 40 to 49.

B.43 As outlined in the 2011 Census, 24.8% of households in Dover District were older person only households (households where all members are 65 or over), compared to 21.9% regionally and 20.5% nationally. Of these older person only households in Dover District in 2011, 59.1% contained only one person, a higher proportion than that recorded in the South East region (57.7%) but lower than the figure for England (60%)⁴¹.

B.44 During the preparation of the Publication Local Plan, the minimum requirement for housing need in the District was calculated using the standard method in national planning guidance and baseline 2014-based household projections. In April 2022, this equated to a requirement for 596 dwellings per year, totalling 11,920 dwellings across the 20-year Plan period 2020 to 2040. A 10% buffer (1,192 dwellings) was added to this total to provide the necessary flexibility to ensure the District's minimum housing needs are delivered within the Plan period⁴².

B.45 The District has a number of existing commitments which reduce the overall level of housing the Local Plan will need to plan for through site allocations and windfalls⁴³. Commitments are sites with existing planning permission, both major and minor. As of 1st April 2020, during the preparation of the Draft Local Plan, there were 4,408 extant permissions.

³⁷ Peter Brett Associates (2017). Strategic Housing Market Assessment (Parts 1 and 2). (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-SHMA-Feb-2017.pdf> and <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHEMA-Dover-Part-2-Feb-2017.pdf>)

³⁸ UK House Price Index (2021). (see <https://landregistry.data.gov.uk/app/ukhpi>)

³⁹ ONS (2022). Population and household estimates, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimateenglandandwalescensus2021>)

⁴⁰ Dover District Council (2017). Dover District: Authority Monitoring Report 2016/ 2017. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Authority-Monitoring-Report-2016-17.pdf>)

⁴¹ Peter Brett Associates (2017). Strategic Housing Market Assessment (Parts 1 and 2). (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-SHMA-Feb-2017.pdf> and <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHEMA-Dover-Part-2-Feb-2017.pdf>)

⁴² The 10% buffer is recommended through the District's Strategic Housing Market Assessment (SHMA, 2017) as an appropriate buffer level to ensure need is delivered.

⁴³ The term 'windfall sites' is used to refer to those sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's Local Plan. Over the last 10 years windfall development has made an important and sustained contribution to the provision of additional homes in this District, accounting for 45% of all completed dwellings within the District over this period. Over two thirds of these windfall developments have been new-build dwellings, with 85% of these coming forward on previously developed land.

B.46 Taken together, the total residual housing requirement that the Draft Local Plan (Regulation 18) was found to need to deliver over the Plan period through the allocation of sites and windfall development was 8,704 dwellings (rounded down to 8,700).

B.47 The SA of the District's growth options noted that the final housing target for the Local Plan was subject to change up until the methodology for calculating need was finalised towards the end of the plan-making process. During the preparation of the Regulation 19 Publication Local Plan, the minimum requirement for housing need in the District was calculated using the standard method in national planning guidance and baseline 2014-based household projections. In April 2022, this equated to a requirement for 611 dwellings per year, totalling 10,998 dwellings across the 18-year plan period 2022 to 2040. A contingency buffer (roughly 8.4%) increases the figure by 926 dwellings to 11,924 dwellings. Factoring in updated extant commitments recorded during the preparation of the Publication Local Plan (5,282 dwellings), the total residual housing requirement that the Publication Local Plan must plan for through the allocation of sites and windfall development is 5,716 dwellings. The significant effects of this lower scale of growth are appraised in Chapter 7 through the SA of the Regulation 19 Publication Local Plan.

B.48 In December 2021, this equated to a requirement for 611 dwellings per year, totalling 10,998 dwellings across the 20-year plan period 2020 to 2040. A contingency buffer (roughly 9.1%) increases the figure by 996 dwellings to 11,994 dwellings. Factoring in updated extant commitments recorded during the preparation of the Publication Local Plan (5,282 dwellings), the total residual housing requirement that the Publication Local Plan must plan for through the allocation of sites and windfall development is as 5,282 dwellings.

B.49 A Whole Plan Viability Assessment (2020)⁴⁴ undertaken alongside preparation of the Publication Local Plan in order to ensure that its contents are viable over the Plan period. However, the assessment highlights the importance of ongoing and proactive dialogue between site owners and developers and the Council. The assessment also acknowledges the uncertainty around the impact of COVID-19 and Brexit on the economy and recommends that the Council monitor their effects closely, so that appropriate changes can be made to the Local Plan before it is adopted.

Education

B.50 Skill attainment levels in the District have improved over the last ten years. The percentage of residents of working age without qualifications has decreased and is now lower than the Kent average⁴⁵. The percentage of working age residents with NVQ 4 qualifications increased from 33.3% to 34.6%, between 2019 and 2021⁴⁶. This is lower than both the regional (45.2%) and national average (43.6%).

B.51 The Kent and Medway Growth and Infrastructure Framework (GIF)⁴⁷ highlights significant capacity issues at primary schools around Dover and Deal (although authority-wide surplus). According to the Commissioning Plan for Education Provision in Kent⁴⁸, the number of primary age pupils is expected to continue rising from 139,714 in 2025-26 to 141,301 in 2035-36, although falling birth rates are likely to mitigate this. In the same period the number of secondary age pupils in Kent schools is expected to rise from 103,639 in 2025-26 to 108,468 in 2035-36. KCC will address these increasing school pupil numbers by expanding existing schools and creating new primary, secondary and special schools.

Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% of windfall permissions being located at Dover, 31% at Deal and 12% within the defined settlement confines of rural villages.

⁴⁴ HDH Planning and Development (2020). Whole Plan Viability Study. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-WPVS-5.11.20-WITH-APPENDICIES.pdf>)

⁴⁵ Dover District Council (2020). Dover District: Authority Monitoring Report 2020/21. (see <https://www.dover.gov.uk/Planning/Regeneration/PDF/AMR-1432reduced.pdf>)

⁴⁶ NOMIS (2021) Labour Market Profile: Dover. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157314/report.aspx#tabequals>)

⁴⁷ Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf)

⁴⁸ Kent County Council (2020). Commissioning Plan for Education Provision in Kent 2022-2026. (see https://www.kent.gov.uk/_data/assets/pdf_file/0005/131486/Commissioning-Plan-for-Education-Provision-in-Kent-2022-to-2026.pdf)

Deprivation

B.52 The English Indices of Deprivation 2019 reinforce previously identified patterns of deprivation across the District⁴⁹. Dover District continues to have deprivation 'hot spots' that are amongst some of the most deprived small areas in the country yet are geographically close to some of the least deprived areas in the country.

B.53 When compared with other local authorities in Kent and England as a whole, the District of Dover is in the bottom half of the country's most deprived local authorities. Dover is ranked 1 nationally (1 being the most deprived), out of over 325 English local authority Districts. Figure B1 illustrates the indices of multiple deprivation across the District.

Health

B.54 The health of people in Dover is varied compared with the England average. The rate of alcohol-related harm hospital stays is 485 (rate per 100,000 population), which is better than the average for England. However, estimated levels of adult excess weight are worse than the England average. Life expectancy is 5.9 years lower for men and 4.4 years lower for women in the most deprived areas of Dover than in the least deprived areas⁵⁰.

B.55 About 19.4% (3,715) of children live in low income families. In Year 6, 19.1% (206) of children are classified as obese. Levels of GCSE attainment and smoking at time of delivery are worse than the England average⁵¹.

B.56 According to Public Health England, priorities in Dover include improving life expectancy by preventing suicide, cancer and reducing smoking prevalence, during pregnancy and improving physical activity in children and adults⁵².

Open spaces, sport and recreation

B.57 There is a vast array of open spaces in the Dover District, including major municipal parks, gardens, local nature reserves, promenades, sports pitches and various informal grass areas.

B.58 With regard to accessible green space, an assessment⁵³ of current provision against the accessible green and open space standards shows that in general the quantity of provision is acceptable. Furthermore, the vast majority of open spaces rate above the threshold for quality. Enhancing existing sites instead of creating new spaces is a priority in the short term. The Open Space and Play Standards Paper (2020) considers the likely increase in future open space requirements based on current population forecasts, identifying a need for up to 55ha of accessible green space, over 6ha of allotments roughly 1.75ha of play space for children and young people.

B.59 The Council's Green Infrastructure Strategy⁵⁴ reports the District's wide range of extremely high-quality Green Infrastructure (GI) assets. It identified the country parks of Samphire Hoe and Fowlmead alongside the major formal parks (such as Kearsney Abbey, Russell Gardens, Connaught Park, Pencester Gardens and Victoria Park, Deal) to be the most significant in terms of accessible green space.

B.60 An extensive public rights of way network covers much of Dover District and includes the strategic routes of the White Cliffs Country Trail and North Downs Way. It also includes the England Coast Path which is a new National Trail that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. Due to its scale, the England Coast Path is being developed in 'stretches'. On 19th July 2016 the first stretches of the Coast Path in Kent,

⁴⁹ UK Government (2019). English Indices of Deprivation 2019. (see <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

⁵⁰ Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-name=dover>)

⁵¹ Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->)

⁵² Public Health England (2020). Dover District: Health Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area->)

⁵³ Dover District Council (2020). Open Space and Play Standards Paper. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/open-space-and-play-standards-paper-2019.pdf>)

⁵⁴ Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

between Ramsgate and Chamber, were opened to the public. Given the importance of accessibility to GI issues, the network has the potential to play an important role in the GI strategy⁵⁵.

B.61 With regard to sport and recreation, the Playing Pitch Strategy⁵⁶ highlights issues with the quality of some of the District's cricket pitches and tennis courts. Furthermore, there is an under provision of 5v5 and artificial turf football pitches and rugby union pitches and tennis courts. The most severe deficiencies occur in Dover. There is little in the way of spare capacity. Deficiencies in ancillary facilities sometimes present a barrier to participation. For example, the quality of changing facilities. Figure B2 illustrates a range of services and facilities across the District.

B.62 The Playing Pitch Strategy (2019) considers the likely increase in future playing pitch requirements based on current population forecasts, identifying a need for up to eight adult football pitches, ten youth football pitches, eight mini soccer pitches, four rugby union pitches and four cricket pitches.

Crime

B.63 Kent has the highest crime rate in England and Wales⁵⁷ and the rate of violent crime in the District is growing⁵⁸. There has been a steady increase in total annual crimes over the past five years in Dover District, with 1,099 crimes recorded in June 2022, compared with 707 crimes recorded in July 2020 and 1,137 in July 2021⁵⁹.

Noise and odour

B.64 There are several notable land uses within the District which have the potential to affect existing and new communities within close proximity to them. Major roads such as the M20/A20, M2/A2 and A256 generate noise and air pollution which has the potential to affect those living in nearby areas, particularly during peak traffic times. Dover Town is the world's busiest roll on roll off ferry port, with ferries departing for France every 20 minutes. The Port of Dover also serves as a major International Cruise ship terminal⁶⁰. Altogether there are 10 railway stations located in the District. Within Dover District, Dover Priory railway station is the busiest. South Eastern Railway provides a high speed rail service to and from London in one hour. There are no airports located within the District. However, there are plans to reopen Manston Airport in the neighbouring District of Thanet, following the granting of a development consent order, as an airfreight hub of national significance. Noise from the operational airport has the potential to adversely affect Dover communities on flight paths to and from the airport. Consultation on the proposed noise mitigation plan took place between January and February 2018. Revisions were made to the mitigation plan in July 2019⁶¹.

⁵⁵ Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

⁵⁶ Dover District Council (2019). Playing Pitch Strategy and Action Plan

⁵⁷ UKCrimeStats (2021). Crime by Subdivision. (see <https://www.ukcrimestats.com/Subdivisions/>)

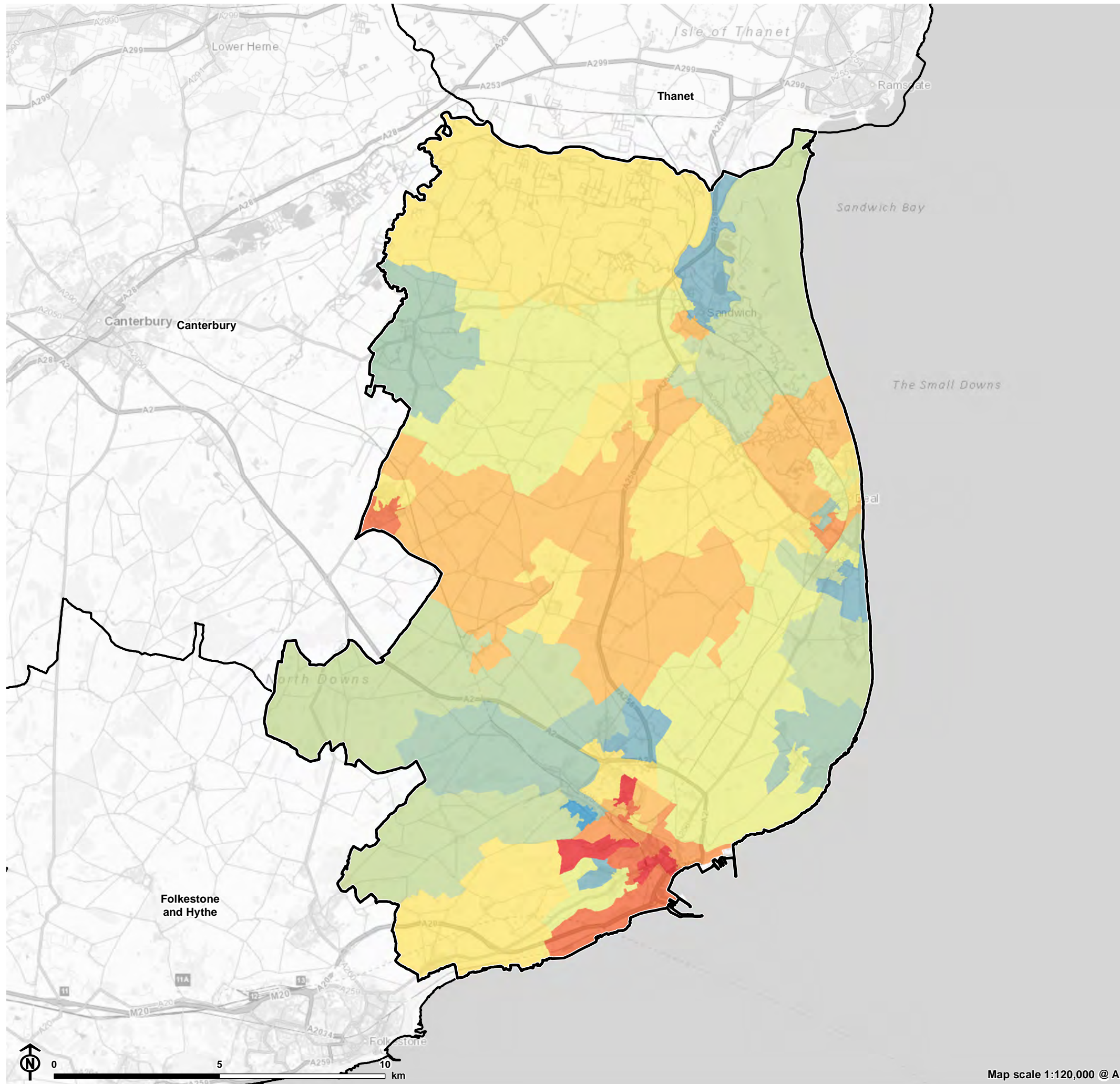
⁵⁸ Public Health England (2020). Dover District: Heath Profile 2019. (see <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000108.html?area-profiles/2017/e07000108.pdf>)

⁵⁹ UKCrimeStats (2021). Crime by Subdivision. (see <https://www.ukcrimestats.com/Subdivisions/>)

⁶⁰ Dover District Council (2017). 'Getting Around Dover District'. (see <https://www.dover.gov.uk/Transport,-Streets--Parking/Transport--Streets/Getting-Around.aspx#Rail>)

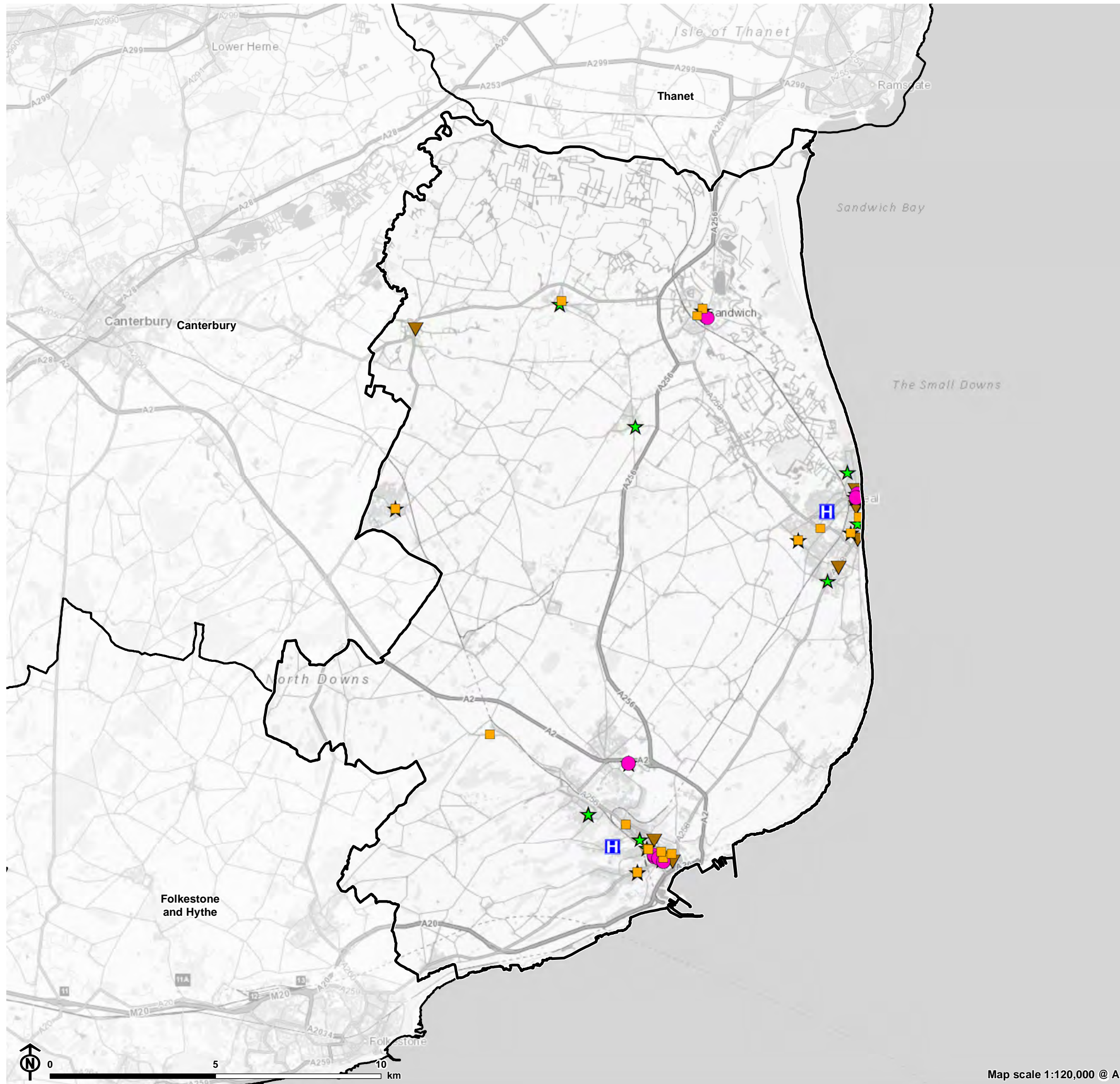
⁶¹ River Oak Strategic Partners (2019). Revised 2.4 Noise Mitigation Plan: Manston Airport Development Consent Order. (see <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-004719-Noise%20Mitigation%20Plan%20D12%20clean.pdf>)








Figure B.1: Index of Multiple Deprivation



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

Figure B.2: Services and Facilities



-  District boundary
-  Neighbouring district boundary
-  GP practice
-  Optician
-  Pharmacy
-  Dentist
-  Hospital

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.65 Analysis of the baseline information has enabled a number of key sustainability issues facing Dover to be identified. They are as follows:

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

SA objectives

Table B.1: Population growth, health and well-being SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	SA1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period? SA1.2: Does the Plan allocate small, medium to scale sites to deliver homes in the short, medium and long term? SA1.3: Do the Plan's allocations safeguard and enhance the identity of the District's existing communities and settlements?	Population Human Health Material Assets
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	SA2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all? SA2.2: Does the Plan promote health and wellbeing by maintaining, connecting and creating multifunctional open spaces, green infrastructure, recreation and sports facilities, including those set out in the Dover District Sport and Recreation Strategy? SA2.3: Does the Plan protect health and wellbeing by preventing, avoiding and mitigating adverse health effects associated with poor air quality, noise, vibration and odour?	Population Human Health Material Assets

Economy

Policy context

International

B.66 There are no specific international or European economic policy agreements relevant to the preparation of the Local Plan and the SA, although there is a large number of trading agreements, regulations and standards that set down the basis of trade within the EU and with other nations.

National

B.67 National Planning Policy Framework (NPPF) (2021)⁶² contains the following:

- The economic role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.
- Planning policies should address the specific locational requirements of different sectors.
- Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”.
- When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.
- The NPPF requires Local Plans to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”

B.68 National Planning Practice Guidance (NPPG) (2021)⁶³: reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

B.69 The Local Growth White Paper (2010)⁶⁴: highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

B.70 Build Back Better: Our Plan for Growth (2021)⁶⁵: sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.71 National Infrastructure Delivery Plan (2016-2021)⁶⁶: sets out the government’s plans for economic infrastructure over a five year period with those to support delivery of housing and social infrastructure.

⁶² Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

⁶³ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (last updated 24 June 2021). National Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

⁶⁴ Department for Business, Innovation and Skills (2010). Local Growth: Realising Every Place’s Potential. (see <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>)

⁶⁵ HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html>)

⁶⁶ Department for Business, Energy and Industrial Strategy (2016). National Infrastructure Delivery Plan. (see <https://www.gov.uk/government/collections/national-infrastructure-plan>)

B.72 The Levelling Up and Regeneration Bill (2022)⁶⁷ sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

B.73 UK Industrial Strategy: building a Britain fit for the future (2018)⁶⁸: lays down a vision and foundations for a transformed economy. Areas including: artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

B.74 Agriculture Act 2020⁶⁹: legislation setting out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the government’s 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

B.75 Agricultural Transition Plan 2021 to 2024 (2020)⁷⁰: sets out the changes going to be made to agricultural policy in England from January 2021 to the end of 2027. Between 2021 and 2027, the government will gradually phase out direct payments and introduce a new system based on the principle of public money for public goods. The government will pay farmers and land owners to improve the environment, animal health and welfare, and reduce carbon emissions. There will be three levels of support aimed at paying for sustainable farming practices, creating habitats for nature recovery and making landscape-scale change such as establishing new woodland and other ecosystem services. Some options will be universally open to all farmers and land managers, while others will be more targeted at a smaller number of large projects. There will also be significant grants made available to support farmers to reduce their costs and improve their profitability, to help those who want to retire or leave the industry, and to create new opportunities and support for new entrants coming into the industry.

B.76 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)⁷¹: the aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

Sub-national

B.77 South East Local Enterprise Partnership (SELEP) Economic Recovery and Renewal Strategy (2021)⁷²: this document sets out how SELEP will work with partners to recovery from the COVID-19 pandemic. The document outlines four strategic priorities:

- Foster business resilience and growth in the South East business community;
- Promote the South East business community as the ‘UK’s Global Gateway’;
- Support communities in South East business community for the future; and
- Increase the productivity of the coastline in the South East business community.

⁶⁷ Department for Levelling Up, Housing and Communities (2022) Levelling Up and Regeneration Bill. (<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

⁶⁸ Department for Business, Energy and Industrial Strategy (2018). Building a Britain fit for the future. (see <https://www.gov.uk/government/topical-events/the-uks-industrial-strategy>)

⁶⁹ UK Parliament (2020). Agriculture Act 2020. (see <https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm>)

⁷⁰ Department for Environment, Food and Rural Affairs (2020). Agricultural Transition Plan 2021 to 2024. (see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

⁷¹ LEP Network (2017). Response to the Industrial Strategy Green Paper Consultation. (see <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>)

⁷² South East Local Enterprise Partnership (2021). Economic Recovery and Renewal Strategy. (see <https://www.southeastlep.com/our-strategy/economic-recovery-and-renewal-strategy/>)

B.78 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)⁷³: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

- The Dover Western Docks Revival is developing Dover's cargo business with a new cargo terminal and distribution centre to boost productivity and employment.
- Implications and uncertainties regarding post-Brexit border control management.

B.79 Kent and Medway Economic Renewal and Resilience Plan (2020)⁷⁴: outlines the Kent and Medway Economic Partnership's priorities for supporting post COVID-19 economic renewal and the development of an economy that will be more resilient in the future. The Renewal and Resilience Plan seeks to deliver against three key principles, focused on:

- Greener Futures (building a more sustainable, lower carbon economy).
- Open and Productive (supporting long term productivity growth in an economy that welcomes investment and trade).
- Better Opportunities, Fairer Chances (ensuring that people are supported through recession and stand to gain from a more resilient economy in the return to growth).

B.80 Kent and Medway Employment Plan (2020)⁷⁵: identifies actions that will mitigate the extent and impact of unemployment and under-employment in Kent and Medway. The Employment Plan sets out four key priorities:

- Supporting young people into work, maximising benefits from the Government's Kickstart scheme and ensuring that delivery partners in Kent and Medway work together; developing a network of hubs where young people facing barriers to employment can access work and skills advice; exploring new opportunities for work-based learning in the context of weaker industry demand; and increasing opportunities to access higher education.
- Supporting the existing workforce, especially older workers experiencing unemployment or at risk of redundancy. This includes coordination of the Adult Education Budget across Kent and Medway to increase access to digital skills, and access to careers advice and guidance as workers change sector and occupation.
- Responding to redundancy, to mitigate the impacts of redundancy programmes where they occur, by encouraging use of Jobcentre Plus's Rapid Response Service and delivering advice to businesses via the Kent and Medway Growth Hub.
- Driving future demand, through the business support and investment measures proposed in the Kent and Medway Renewal and Resilience Plan, promoting local employment as firms expand and new projects come forward, and developing a more robust understanding of labour supply and demand as we plan for the future.

B.81 Lighting the way to success: The East Kent Local Strategic Partnership Sustainable Community Strategy (2009)⁷⁶: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030:

- East Kent will have a thriving and diverse local economy, well adapted to the needs and character of the area.
- East Kent will retain more of its young people as they enter employment and more people will move into the area, drawn by its exceptional living environment, good schools, high quality public services, well-target housing supply, and connections to London, the South East and Europe.

⁷³ Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

⁷⁴ Kent County Council (2020). Kent and Medway Economic Renewal and Resilience Plan. (see https://www.kent.gov.uk/_data/assets/pdf_file/0014/112280/Economic-Renewal-and-Resilience-Plan-Backing-Jobs-and-Businesses-Plan.pdf)

⁷⁵ Kent County Council (2020). Kent and Medway Employment Plan. (see https://www.kent.gov.uk/_data/assets/pdf_file/0003/116706/Kent-and-Medway-Employment-Plan.pdf)

⁷⁶ East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Document-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Document-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

- There will be strong links between businesses and the education system, including Further and Higher Education, ensuring the delivery of relevant courses, work experience and key employment skills; attracting greater numbers of students and retaining graduates in local careers.
- East Kent will be reaping the benefit of an expanded transport network. Benefits will include greater mobility for businesses and wider opportunities for employment.
- The revival of East Kent's coastal resorts and the integrated marketing of its attractions will have boosted visitor numbers, average expenditure and length of stay, supporting an additional 10,200 jobs in the tourist economy.

B.82 East Kent Local Investment Plan 2011-2026 (2011)⁷⁷: outlines the scale and focus of investment and support required to deliver a programme of projects that will deliver the East Kent Sustainable Communities Strategy's vision and priorities. Economic prosperity and job creation is at the heart of the East Kent vision. This will include rebalancing the economy through nurturing both new investment and existing businesses and by making sure innovation and enterprise go hand in hand. East Kent Partners have identified 8 strategic spatial priorities, 3 of which are relevant to Dover District:

- Dover Port, Waterfront and Town Centre:
 - Expansion of Dover Port: To consolidate position as global gateway for movement of passengers and freight.
 - Dover Waterfront: A 12.2 hectare brownfield, mixed use development including hotel, restaurants, offices, retail and a minimum of 300 new residential homes with potential for up to 800. Potential for 90-240 affordable homes.
 - Mid Town: A 5.9 hectare brownfield, mixed use development comprising residential, retail, restaurants, education. At least 100 new homes with potential for at least 30 affordable homes.
 - St James: A 3.2 hectare brownfield, mixed use town centre physical regeneration site. Development will include a supermarket anchor store, retail residential, hotel and leisure facilities.
 - Public transport improvements: To address challenges associated with the expansion of Dover, the splitting of port traffic along the A2 Corridor for the Eastern Docks and A20 for the Western Docks, and providing sustainable transport solutions to the planned expansion at Whitfield. A central theme here will be to ensure effective integration with Dover Train Station and the High Speed 1 service.
- A2 Corridor:
 - Improvements include dualling of the A2 between Lydden and Whitfield to facilitate housing growth and the longer term strategic aim of separating HGV demand at the Port of Dover via the A2 and A20.
- Whitfield Extension:
 - The core element of Dover's Growth Point focused around a 309 hectare site capable of providing up to 5,750 new homes (including a proportion of affordable homes) supported by a range of infrastructure and community facilities.

B.83 Kent and Medway Energy and Low Emissions Strategy (2020)⁷⁸ sets out how they will respond to the UK climate emergency and promote clean and resilient economic recovery that eliminates poor air quality, reduces fuel poverty and promotes the development of an affordable, clean and secure energy supply across Kent and Medway. The Strategy identifies ten high-level priorities for collaborative action in the short- and medium-term:

- Emission Reduction Pathways to 2050;
- Public Sector Decision Making;
- Planning and Development;
- Climate Emergency Investment Fund;
- Building Retrofit Programme;

⁷⁷ East Kent Local Strategic Partnership (2011). East Kent Local Investment Plan 2011-2026. (see <https://www2.canterbury.gov.uk/media/160669/appendix-e-local-investment-plan-part-a.pdf>)

⁷⁸ Kent County Council (2020). Kent and Medway Energy and Low Emissions Strategy. (see https://www.kent.gov.uk/_data/assets/pdf_file/0009/112401/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf)

- Transport, Travel and Digital Connectivity;
- Renewable Energy Generation;
- Green Infrastructure;
- Supporting Low Carbon Business; and
- Communications.

Current baseline

B.84 Dover District represents a reasonably small but productive economy in East Kent. When compared with the share of employment in the South East, the District is overrepresented in the wholesale and transport, public administration and defence, utilities and manufacturing sectors, whilst being under-represented in professional and other private sectors. The current major employment locations are the Port of Dover and the various industrial estates around Sandwich.

B.85 The Dover Economic Development Needs Assessment⁷⁹ notes the local labour market is characterised by a lower share of the working-age population being economically active and a higher share claiming out-of-work benefits when compared to the Kent and South East averages. Across the local economy overall, 17.7% of Dover District's working residents had been furloughed through the Coronavirus Job Retention Scheme (JRS) at the height of the pandemic in May 2020, and while local unemployment has risen sharply, the full effects are likely to be masked by the extension of government support schemes such as the JRS.

B.86 Based on the latest available Experian data, Dover District accommodated 42,200 workforce jobs in 2021, representing a decline of 5% (-2,200) over the five-year period from 2016 (i.e. the baseline year for the 2017 EDNA). This rate of job decline is higher than that recorded in the South East (-2.2%) and the UK (-0.06%) during the same period. The District's employment base has been gradually declining over this five-year period. Whilst 2021 recorded the lowest employment count at 42,200 workforce jobs, the trend of job decline had begun well ahead of the outbreak of Covid-19 in early 2020.

B.87 Table B.2 below from the Dover Economic Development Needs Assessment⁸⁰ shows the available supply should broadly be sufficient to meet identified office, general industrial and distribution needs, a shortfall emerges with regards to light industrial use. However, a significant proportion of available supply is for a flexible mix of 'B class' uses, so could help to address this 'gap' in relation to light industrial uses depending on the form of development that comes forward.

Table B.2: Demand/Supply balance to 2040 by use

Use	Floorspace Requirement (GEA sqm)		Available Supply (sqm)	Overall Balance
	Labour Demand	Past Development Rates		
Office	11,985	-18,120	7,407	Balanced
Light Industrial	42,330	25,740	6,867	Shortfall
General Industrial	-7,240	52,250	47,672	Balanced
Distribution	1,850	37,840	36,413	Balanced
Mixed Use	-	19,580	81,049	Surplus
Total	48,925	117,290	179,407	Surplus

⁷⁹ Lichfields (2021). Dover Economic Development Needs Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf>)

⁸⁰ Lichfields (2021). Dover Economic Development Needs Assessment Update. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf>)

B.88 The District's job base could recover to pre-pandemic levels by 2022/23 and then record steady growth for the remaining years of the Local Plan period to 2040. The overall scale of employment growth implied by the latest Experian forecasts is not dissimilar to that implied by equivalent forecasts analysed as part of the 2017 EDNA, but by comparison, expects office, industrial and distribution sectors to make a much larger contribution to job growth over the Local Plan period to 2040. This results in a significantly higher employment space requirement for the 20-year Plan period of 48,925m² or 11.1ha in land terms, compared with -0.8ha in the 2017 EDNA (covering a 21-year period to 2037). The majority of this requirement relates to light industrial uses. It also assumes that recent patterns of job decline across the District are reversed, as the economy recovers from Covid-19 and grows over the longer term. The Dover Economic Development Needs Assessment⁸¹ refers to this scale of growth as the minimum to ensure that business growth potential is not constrained by lack of spatial capacity in future.

B.89 If the last five-year development trend were to continue over the Local Plan period to 2040, this would require over 117,000m² or nearly 31ha of employment land, and could accommodate a range of mainly industrial and mixed office/industrial uses. The Council has a clear aspiration to introduce a step change in the delivery of economic growth within the District, as reflected within its new Economic Growth Strategy. This identifies a number of growth opportunities and projects (such as The Citadel, Western Heights, Dover Waterfront/Wellington Dock and Snowdown Park) which collectively offer the potential to achieve a higher level of job growth than implied by the latest Experian forecasts. The Dover Economic Development Needs Assessment⁸² refers to this scale of growth as an indication of the scale of market potential for employment development should sufficient land in the right place be made available for developers and business occupiers in the District.

B.90 In addition, a large part of the District's employment land supply is wrapped in a number of large strategic allocations, notably White Cliffs Business Park and Discovery Park. The Dover Economic Development Needs Assessment⁸³ therefore recommends that Council consider some selective allocation of additional sites over and above existing employment allocations in order to provide additional flexibility and choice to the market over the new Local Plan period.

B.91 The Kent Environment Strategy⁸⁴ sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the sustained austerity on public sector finances and the need to work more efficiently. This means identifying opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible to deliver priorities.

B.92 Uncertainty exists over what the economic impacts of Britain's exit from the EU. However, there is general consensus that the immediate impact will be negative. There is evidence of ongoing friction in trade and travel with Europe as different sectors of the economy work through the practicalities of the new trading arrangements and restrictions. Experian data suggests up to 20% of Dover District's local GVA (economic output) is concentrated within those sectors considered to be at highest Brexit risk. The impact of COVID-19 on changes in consumer behaviour and spending patterns tied to changes in average economic circumstances and travel patterns is unknown. The Social Market Foundation briefing paper published in July 2020 highlights that "lockdown will change consumer and business behaviour on a long-lasting basis, with a permanent shift to homeworking and digital retail. This change will impact urban spaces, risking widening income and wealth inequality. Reduced commuting costs will benefit white collar professionals, while those working in retail face widespread job losses".

B.93 The Dover Economic Development Needs Assessment Update⁸⁵ states it is too early to understand how the pandemic and resulting structural changes may affect how businesses operate and the resultant demand for employment land. Sectors likely to grow during the pandemic include the health, logistics, energy, IT and communications and tourism sectors. A shift away from the county's large cities to areas with a better quality of life could benefit Dover.

B.94 Similarly, it is likely that COVID-19 will accelerate the shift towards online retail and service access, resulting in higher shop vacancy rates on the high street and in retail parks as stores become financially unviable. Office space could increasingly become vacant and difficult to re-let as firms embrace a policy of (at least) partial homeworking, resulting a need to allocate less office space in Local Plans. This will have knock-on impacts for other businesses. Without office workers, tourists and shoppers returning to cities, food and drink and cultural attractions are at risk, as well as office management and cleaning services.

⁸¹ Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

⁸² Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

⁸³ Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

⁸⁴ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

⁸⁵ Lichfields (2021). Dover Economic Development Needs Assessment Update. Unpublished

B.95 With regards to future retail need, the Retail and Town Centre Needs Assessment (2018)⁸⁶ concluded that there was no forecast capacity for new convenience goods floorspace over the Plan period; and no capacity for new comparison goods floorspace over the short term (to 2022) and the medium term (to 2027). However, by 2032 it identified capacity for 615sqm net comparison goods floorspace rising to 3,243sqm net by 2037.

B.96 The Retail and Town Centre Needs Assessment was then updated in September 2021⁸⁷ to take account of:

- The implications arising from the COVID-19 pandemic;
- Updates to National Policy and the Governments changes to the Use Classes Order and Permitted Development rights; and
- Changes to the Plan period.

B.97 The update to the Retail and Town Centre Needs Assessment identified no capacity for new convenience goods floorspace over the plan period to 2040. Looking at the centres in the District the study concluded that the Council needs to plan for less, not more retail floorspace over the next 5-10 years and beyond. The study did however identify a need for around 22 food and beverage outlets by 2040. Some of this need can be absorbed into existing businesses with remaining forecast need directed to the town centres first. In most cases the forecast need and any market demand can be met by the take up of suitable vacant units, the re-purposing of floorspace and/or part of mixed use developments.

Sustainability issues and likely evolution without the Local Plan

B.98 Key sustainability issues facing Dover are as follows:

- Job density in Dover District will continue to lag behind other Kent Districts without coordinated action in the Local Plan to promote regeneration of its town centres, improve the sustainability and prosperity of the rural economy and the provision of appropriate employment space(see SA objective 3).
- The Local Plan offers an opportunity to capitalise on the regional investment at Dover Port, Waterfront and Town Centre by diversifying and expanding the District's employment areas industrially and geographically to provide equality of access and opportunity (see SA objective 3).
- Uncertainty exists over what the economic impacts of Britain's exit from the EU and COVID-19. The Local Plan will need to offer sufficient flexibility to respond to these uncertainties (see SA objective 3).

SA objectives

Table B.3: Economy SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA3: To deliver and maintain sustainable and diverse employment opportunities.	<p>SA3.1: Does the District have an adequate supply of land and infrastructure to meet the District's forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?</p> <p>SA3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?</p> <p>SA3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?</p> <p>SA3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?</p>	<p>Population</p> <p>Human Health</p> <p>Material Assets</p>

⁸⁶ Carter Jonas (2018). Dover District Council Retail and Town Centre Needs Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Retail.aspx>)

⁸⁷ Lambert Smith Hampton (2021). Dover District Council Retail and Town Centre Needs Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Retail.aspx>)

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
	<p>SA3.5: Does the Plan support the prosperity and diversification of the District's rural economy?</p> <p>SA3.6: Does the District have sufficient education facilities to help provide the working population the District's existing and future employer needs?</p>	

Transport connections and travel habits

Policy context

International

B.99 The Trans-European Networks (TEN): created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

National

B.100 National Planning Policy Framework (NPPF) (2021)⁸⁸: encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

B.101 National Planning Practice Guidance (NPPG) (2021)⁸⁹: reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

B.102 The Road to Zero (2018)⁹⁰: sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.103 Transport Investment Strategy (2017)⁹¹: sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.104 Door to Door: A strategy for improving sustainable transport integration (2013)⁹²: focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

⁸⁸ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

⁸⁹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

⁹⁰ HM Government (2018). The Road to Zero. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

⁹¹ Department for Transport (2017). Transport Investment Strategy. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf)

⁹² Department for Transport (2013). Door to Door: A strategy for improving sustainable transport integration. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

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

B.105 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

B.106 Department for Transport, Road Investment Strategy 2: 2020-2025 (2020)⁹³: the second Road Investment Strategy sets a long-term strategic vision for the network. It specifies the performance standards Highways England must meet, lists planned enhancement schemes expected to be built and states the funding that will be made available by the DfT during the second Road Period, which covers 2020/21 to 2024/25.

B.107 The Environment Act 2021⁹⁴ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

B.108 Decarbonising Transport: A Better, Greener Britain (2021)⁹⁵ The Decarbonisation Transport Plan (DTP) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.109 Department for Transport, Decarbonising Transport: Setting the Challenge (2020)⁹⁶: sets out the strategic priorities for a new Transport Decarbonisation Plan (TDP), to be published later in 2020, will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP will take a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.110 The Levelling Up and Regeneration Bill (2022)⁹⁷ sets out the direction for planning and makes provision to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.111 The Cycling and Walking Investment Strategy Report to Parliament (2022)⁹⁸ sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling

⁹³ Department for Transport (2020). Road Investment Strategy 2: 2020-2025. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872252/road-investment-strategy-2-2020-2025.pdf)

⁹⁴ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

⁹⁵ Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

⁹⁶ Department for Transport (2020). Decarbonising Transport Setting the Challenge. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

⁹⁷ Department for Levelling Up, Housing and Communities (2022) Levelling Up and Regeneration Bill. (<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

⁹⁸ Secretary for Transport (2022) Cycling and Walking Investment Strategy Report to Parliament 2022. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf)

the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

Sub-national

B.112 Lighting the way to success: The East Kent Local Strategic Partnership (EKLSP) Sustainable Community Strategy (2009)⁹⁹: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030:

- East Kent will be reaping the benefit of an expanded transport network which closely integrates its unique rail, air, sea and road connections. Benefits will include reduced congestion and less environmental damage.
- Imbalances in the health and life expectancy of East Kent's citizens will have been substantially redressed through a renewed focus on public health; benefit dependency will be on the wane; people will feel far less troubled by crime and anti-social behaviour; poor quality, bad managed housing will have been upgraded.

B.113 Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 (2011)¹⁰⁰: sets out Kent County Council's Strategy and Implementation Plans for local transport investment for the period 2011-31. Transport priorities for Dover include the following:

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

B.114 Kent and Medway Growth and Infrastructure Framework (GIF) (2018)¹⁰¹: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The latest version of the document highlights the following capacity challenges and opportunities in Dover District:

- Implications and uncertainties regarding post-Brexit border control management.
- Strategic network improvements to the A2/M2 are required to support the new Lower Thames Crossing, the growth of Canterbury and the ports of Dover and Ramsgate.
- The effects of Operation Stack and the risks associated with its implementation (estimated to cost Kent and Medway over £1.5mn per day), including congestion exacerbated by freight traffic and overnight lorry parking.

⁹⁹ East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting_the_Way_to_Success_The_EKLSP_Sustainable_Community_Strategy_\(Document_Ref_A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting_the_Way_to_Success_The_EKLSP_Sustainable_Community_Strategy_(Document_Ref_A85).pdf))

¹⁰⁰ Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

¹⁰¹ Kent County Council (2018). Kent and Medway Growth and Infrastructure Framework Update. (see https://www.kent.gov.uk/_data/assets/pdf_file/0018/80145/GIF-Framework-full-document.pdf)

B.115 The GIF summarises future infrastructure projects in Dover, including transport developments at Western Docks A20 improvements, A256 new Junction, Duke of York Roundabout and projects to facilitate development at Whitfield.

B.116 Kent Active Travel Strategy, 2018/19 Action Plan (2019)¹⁰²: seeks to make active travel an attractive and realistic choice for short journeys in Kent. By developing and promoting accessible, safer and well-planned active travel opportunities, this Strategy aims to establish Kent as a pioneering county for active travel:

- Integrating active travel into planning;
- Providing and maintaining appropriate routes for active travel; and
- Supporting active travel in the community.

B.117 The Kent Design Guide (2008)¹⁰³: seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. With regard to transport, the Design Guide promotes a sustainable approach to development which requires that location, transport connections, mix of uses and community facilities, together with careful husbanding of land and energy resources all combine to produce social and economic benefits: healthier living and working environments; improved efficiency and productivity in use; and reduction of fuel costs and the costs of vehicle ownership.

B.118 Kent Rights of Way Improvement Plan (2018-2028)¹⁰⁴: the vision of the ROWIP is to provide a high quality, well maintained network that is well used and enjoyed. Notable improvements in Dover include the creation of a new England Coat path along the District's coastline and beyond, providing access to the coastline in accordance with the Marine and Coastal Access Act 2009 and upgrades to existing public footpaths associated with the Sholden development, providing access to local schools, Fowlmead Country Park and Deal town centre.

Local

B.119 Dover Transport Strategy (2007)¹⁰⁵: the primary purpose of this study was to support the development of the Core Strategy, which proposes significant growth for Dover during the period up to 2026. The Strategy includes an assessment of existing and future (with Core Strategy development) transport conditions, the identification, prioritisation and costing of transport proposals, consideration of the transport issues associated with the Whitfield Masterplan, the growth of Dover Port and an assessment of Air Quality. Key elements of the Dover Transport Strategy are:

- A strategic and dynamic routing strategy for Port traffic.
- Improved access to Dover Priory Station and CTRL services.
- A car parking strategy to manage the demand for town centre car trips.
- Park & Ride at Whitfield and A20 approach.
- Improved one-way system.
- Bus only Pencester Road.
- New express bus services (Bus Rapid Transit).
- Coordinated traffic signal control.
- Improved accessibility for pedestrians and cyclists, including major new Townwall Street crossing.
- A strong transport awareness and behavioural change programme.

¹⁰² Kent County Council (n.d.). Active Travel Strategy. (see https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf)

¹⁰³ Kent Design Initiative (2008). The Kent Design Guide. (see https://www.kent.gov.uk/_data/assets/pdf_file/0014/12092/design-guide-foreword.pdf)

¹⁰⁴ Kent County Council. Kent Rights of Way Improvement Plan 2018-2028 (n.d.). (see <https://www.kent.gov.uk/waste-planning-and-land/public-rights-of-way/projects#tab-1>)

¹⁰⁵ Dover District Council & Partners (2007). Dover Transport Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>)

B.120 The Dover Transport Strategy is in the process of being reviewed as part of the wider Local Plan. As the strategy develops, its findings will be incorporated into the SA.

B.121 Dover and Deal Transportation Model (2018)¹⁰⁶: Dover District Council in partnership with Kent County Council and Highways England has commissioned a transport model of the settlement of Deal. The model will be developed by extending the existing Dover Transport Model to cover all the key roads, in and around Deal. The model will include a survey of traffic flows to help identify issues such as 'pinch points' and 'rat running'. This information will help to assess the need for new transport infrastructure including possible improved connectivity between Dover and Deal.

B.122 Active Travel Strategy (2016)¹⁰⁷: promotes active travel and sets out how the existing walking and cycling network will be maximised. The overarching ambition of the strategy is to make active travel an attractive and realistic choice for short journeys in Kent by planning for it. Delivering on this ambition will lead to improved health through an increase in physical activity; reduced congestion on the highway network by providing better travel choices; and safer active travel.

Current baseline

Road network and congestion hotspots

B.123 Kent is currently facing increased congestion, on both road and rail. Major routes such as the M20/A20, M2/A2 and A256 form important local and strategic links. However, when these are congested it results in delay on the local network, and can have an impact on the wider strategic network also¹⁰⁸.

B.124 The Kent Environment Strategy¹⁰⁹ sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the increased congestion on both road and rail, impacting Kent's economy, health and environment. Major routes such as the M20 and A2/M2 form important local and strategic links for residents and businesses that when congested result in delay on the wider local network.

B.125 Port traffic is currently routed along the M20/A20, which results in severance between Dover town centre and the harbour, and is associated with air quality concerns owing to its use by heavy goods vehicles before and after the Channel crossing. With the construction of a new Lower Thames Crossing, a second strategic route will be available between Dover and the Midlands and North.

B.126 The Dover Western Docks Revival Project aims to create a transformed waterfront with a new marina pier and curve to attract a host of shops, bars, cafés and restaurants within Dover's unique backdrop of the harbour, cliffs and castle. The project will also involve the relocation and further development of Dover's cargo business with a new cargo terminal and distribution centre.

B.127 Port related traffic has a major influence on the town of Dover and the East Kent District as a whole, including the strong seasonal fluctuations in traffic flows during the holiday periods. The A2 approaching the town is of an inferior quality to the rest of the route with sections of single carriageway between Lydden and the Port of Dover. Consequently there is a pressing need for dualling of the remaining sections of single carriageway on the A2 and improvements to the Duke of York's Roundabout and the Whitfield Roundabout. Outside of the District, congestion at Junction 7 of the M2 (Brenley Corner) also affects the area¹¹⁰.

B.128 Following Brexit, uncertainty exists over customs and immigration checks at the Port of Dover and what effect this will have on traffic flow in and out of the area, specifically congestion caused by HGVs transporting goods. An increase in the amount of time it takes to process customs paperwork could result in longer queues, stretching back to Ashford or even further. Work is underway to finalise a solution to alleviate pressure on the road network called 'Operation Stack'.

¹⁰⁶ WSP (2018). Dover and Deal Transport Model. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/180502-Dover-and-Deal-Transport-Model-ASR-Final-Public.pdf>)

¹⁰⁷ Kent County Council (2016). Active Travel Strategy. (see https://www.kent.gov.uk/_data/assets/pdf_file/0007/71773/Active-Travel-Strategy-information.pdf)

¹⁰⁸ Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

¹⁰⁹ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

¹¹⁰ Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

B.129 The Council has commissioned WSP to carry out traffic modelling in the District¹¹¹. The transport model models the impact of permitted and projected housing and employment growth in the District over the Plan period, including expansion of the port and other permitted and planned strategic site allocations. The transport model also factors in the impact of planned highway network changes associated with adopted strategic allocations and general traffic alleviations schemes, including the stopping up of Dover Road north of Castle Hill Road, the inclusion of Whitfield Urban Expansion development road, A2 at-grade roundabout with a northbound priority and a new junction on the A256. The modelling reveals that the Whitfield Roundabout and the Duke of York Roundabout primarily, are operating over capacity in the AM and PM peak. It is expected that proposed improvements or mitigation at these roundabouts could reduce the delay and subsequent re-routing along rural routes. WSP, Dover District Council, Kent County Council and Highways England are working loosely together to determine suitable mitigation strategies for the Whitfield and Duke of York Roundabouts.

Rail network

B.130 Kent's rail network is divided between the High Speed line that runs from London to continental Europe via Ebbsfleet and Ashford, and the mainline. Recent investment such as the High Speed Rail service has improved access along its corridor to London but further investment is required on the whole network to increase service capacity¹¹². Indeed the Growth and Infrastructure Framework¹¹³ states that 17% of all new commuting trips across Kent will be destined for London, a large proportion of which will be by rail. The High Speed rail services from Dover to St Pancras have significantly reduced journey times to London, making the journey more attractive to commuters in particular. However, Dover District Council is pressing for a journey time of less than 1 hour between the two stations, additional capacity on the High Speed route, and investigation into a new Whitfield Station¹¹⁴.

Bus network

B.131 There is an extensive bus network delivered on a largely commercial basis by a combination of national operators and local companies. Bus services in Dover serve the town and connect to surrounding towns including Canterbury, Deal, Sandwich and Folkestone. Kent's ageing population is increasingly reliant on bus services in particular, as are younger people and those without access to a car¹¹⁵. Specific areas of Dover with particularly low levels of car ownership and higher levels of unemployment are found within the wards of St Radigunda, Buckland, Town and Pier, Castle and Tower Hamlets¹¹⁶.

B.132 Dover District Council has been awarded £15.8m from the Government's Housing Infrastructure Fund to support the development of a Bus Rapid Transit System (BRT) between Whitfield, Dover Town Centre and Dover Priory railway station. The development of the Bus Rapid Transit System is designed to take traffic off key local roads and to connect with the growing business community on the White Cliffs Business Park.

B.133 The BRT includes bridge over the A2 for bus, pedestrian and cycle access, dedicated bus link through White Cliffs Business Park (to Dover Road), widening of Dover Road and a new junction onto Castle Hill Road, Junction Improvements at Castle Hill Road and potential future development of a Public Transport Hub in York Street, Dover.

Cycle network

B.134 According to the Dover District Cycling Plan¹¹⁷, the road network is under ever increasing pressure particularly in urban areas (approximately 25% of all car journeys are less than 2 miles). As such, there is considerable scope for people to switch to

¹¹¹ WSP (2021). Dover District Council Transport Model Forecasting. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/wsp-dover-and-deal-transport-model-local-plan-forecasting-report-2021.pdf>)

¹¹² Kent County Council (2017). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

¹¹³ Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf)

¹¹⁴ Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

¹¹⁵ Kent County Council (2011). Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031. (see http://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf)

¹¹⁶ Dover District Council & Partners (2007). Dover Transport Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Transport-Strategy.pdf>)

¹¹⁷ Kent Highway Services (2008). Dover District Cycling Plan. (see https://www.kent.gov.uk/_data/assets/pdf_file/0005/7862/Dover-cycling-strategy.pdf)

using the bicycle to make journeys, particularly in Deal and Sandwich where there is relatively flat terrain. However, there are physical and geographical barriers in Dover that need to be addressed and overcome. At present, there are two National Cycle Routes and three Regional Routes which either begin or pass through the Dover District.

Airports

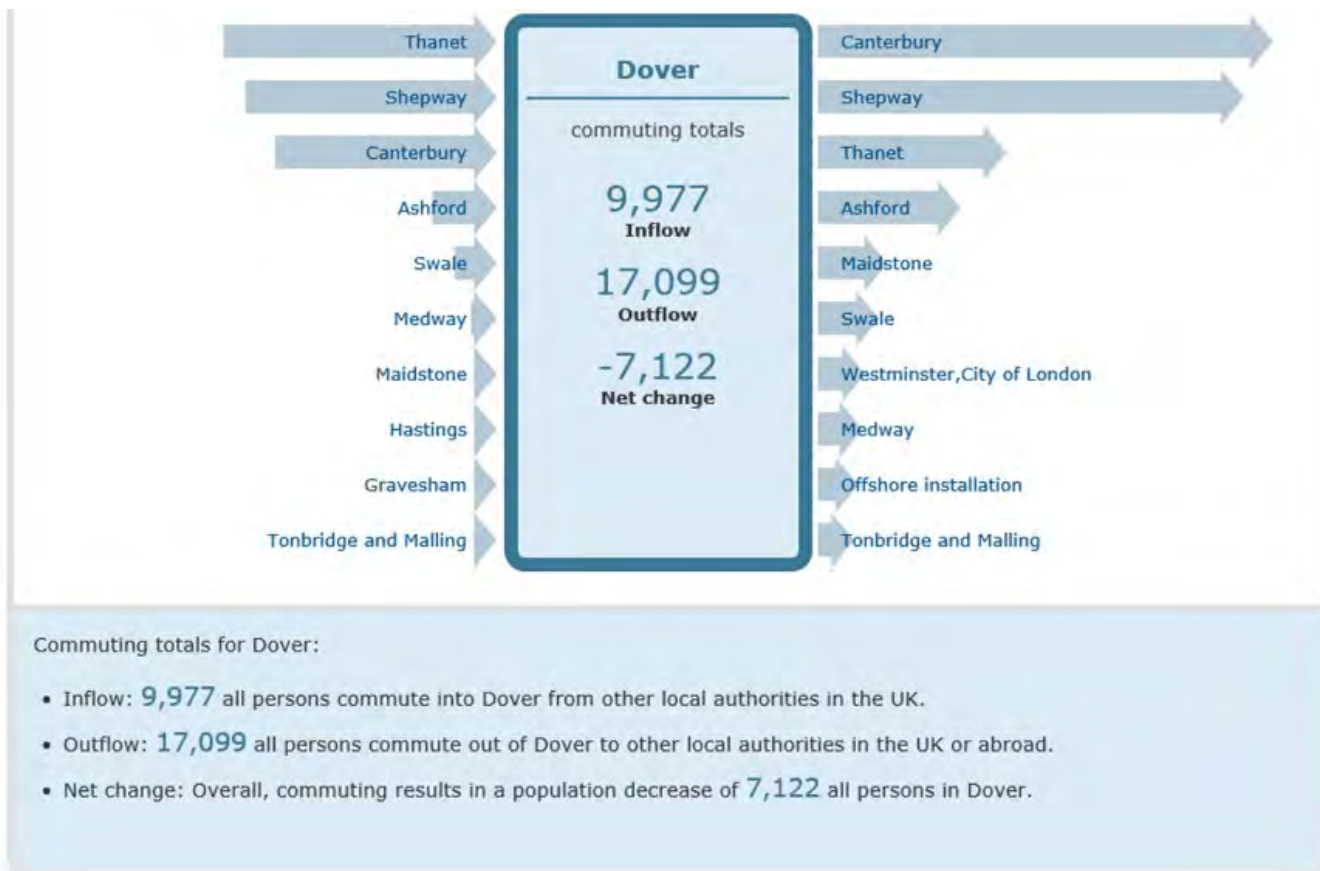
B.135 There are no airports located within the Dover District. However, there are plans to reopen Manston Airport in the neighbouring District of Thanet as an airfreight hub of national significance.

Commuting patterns and travel behaviour

B.136 The District's residents rely heavily on cars to get around and access employment, education, amenities and services. There are many different commuting routes within the Districts and individuals commute in and out of the District from surrounding areas.

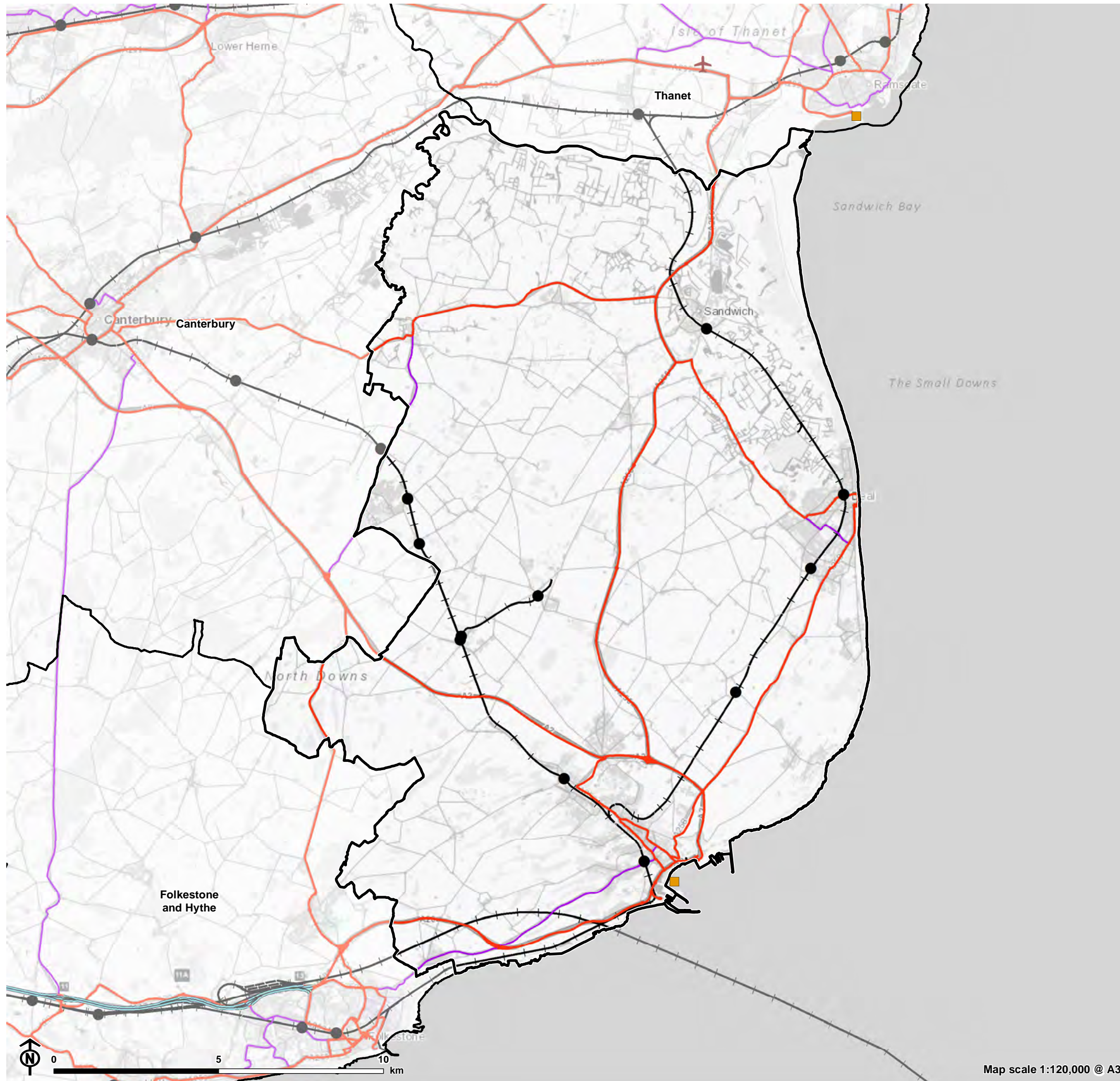
B.137 As set out in Figure B3, prior to the COVID-19 pandemic, around 9,977 individuals commuted into Dover District, whilst 17,099 commuted out of the District. Therefore, overall, there are 7,122 less people in Dover District as a result of commuting. The commuting figures show the strong relationship that Dover has with Canterbury, Folkestone and Hythe (formally known as Folkestone and Hythe), Thanet and Ashford. These figures are anticipated to have reduced significantly during the COVID-19 pandemic with the introduction of work from home arrangements.

Figure B.3: Location of usual residence and place of work in Dover¹¹⁸



¹¹⁸ NOMIS (2011). Location of usual residence and place of work. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>)

Figure B.4: Transport Links Across the District



- District boundary
- Neighbouring district boundary
- Motorway
- A road
- B road
- Railway track
- Railway station
- Airport
- Port

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.138 Key sustainability issues facing Dover are as follows:

- Port-related congestion along the M20/A20, M2/A2 and A256 is resulting in delays on the local network, which has implications for the wider strategic network. It is also associated with poor air quality. Housing and employment growth have the potential to exacerbate this congestion and the associated air, noise and light pollution it generates (see SA objective 4).
- Specific areas of Dover have particularly low levels of car ownership and in some cases, higher levels of unemployment. As such, residents in these areas including the elderly are becoming increasingly reliant on local bus services. Inappropriately located development without a good range of sustainable transport links could exacerbate people's access to services, facilities and employment (see SA objective 4).

B.139 The Local Plan provides an opportunity to update how these issues are addressed over the new Plan period, most notably through the promotion of sustainable locations for development and the provision of sustainable transport infrastructure, which will reduce car dependence and facilitate more walking and cycling, as well as other public transport links.

SA objectives

Table B.4: Transport connections and travel habits SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA4: To reduce the need to travel and encourage sustainable and active alternative to road vehicles to reduce congestion.	<p>SA4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complementary mix of land uses?</p> <p>SA4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks?</p> <p>SA4.3: Does the Plan facilitate working from home and remote working?</p> <p>SA4.4 Does the Plan help to address road congestion, particularly congestion in locations also suffering from congestion related to Port activity?</p>	<p>Air</p> <p>Climatic Factors</p> <p>Population</p> <p>Human Health</p>

Air, land and water quality

Policy context

International

B.140 United Nations Convention on the Law of the Sea (1982)¹¹⁹: international legal framework for all ocean activities, including conservation and resource management.

National

B.141 National Planning Policy Framework (NPPF) (2021)¹²⁰: sets out the following:

- The planning system should protect and enhance soils in a manner commensurate with their statutory status or quality identified in the development plan.
- New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.
- Despoiled, degraded, derelict, contaminated and unstable land should be remediated and mitigated where appropriate.
- The reuse of previously developed land is encouraged where suitable opportunities exist.
- Plans should take a proactive approach to mitigating and adapting to climate change and ensuring resilience to climate change impacts, and new development should avoid increased vulnerability to the impacts of climate change.

B.142 National Planning Practice Guidance (NPPG) (2021)¹²¹: requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land. It also requires that plan making considers, among other issues: identifying suitable sites for new or enhanced water infrastructure; assessing whether new development is appropriate near to sites used for water infrastructure; and the phasing of new development so that such infrastructure will be in place when and where needed. The impact of water infrastructure on sites designated for biodiversity should also be considered.

B.143 Waste management plan for England (2013)¹²²: provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

B.144 Environmental Protection Act 1990¹²³: makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

B.145 Building Regulations (1990)¹²⁴: requires that reasonable precautions are taken to avoid risks to health and safety caused by contaminants in ground to be covered by building and associated ground.

B.146 National Planning Policy for Waste (NPPW) (2014)¹²⁵: key planning objectives are identified within the NPPW, requiring planning authorities to:

¹¹⁹ UN (1982). B.131 United Nations Convention on the Law of the Sea. (see https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf)

¹²⁰ Department for Levelling Up, Housing and Communities (last updated 19 June 2019). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

¹²¹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

¹²² Department for Environment, Food and Rural Affairs (2013). Waste management plan for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf)

¹²³ HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

¹²⁴ HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

¹²⁵ Department for Communities and Local Government (2014). National Planning Policy for Waste. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns
- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

B.147 Water White Paper (2012)¹²⁶: sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.148 Water for Life White Paper (2011)¹²⁷: sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short and longer term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

B.149 National Policy Statement for Waste Water (2012)¹²⁸: sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.150 Future Water: The Government's Water Strategy for England (2008)¹²⁹: sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.151 The Nitrate Pollution Prevention Regulations (2016)¹³⁰: provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when

¹²⁶ Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>)

¹²⁷ Department for Environment, Food and Rural Affairs (2011). Water for life. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf)

¹²⁸ HM Government (2012). National Policy Statement for Waste Water. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

¹²⁹ HM Government (2008). Future Water: The Government's water strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

¹³⁰ HM Government (2016). The Nitrate Pollution Prevention Regulations. (see <https://www.legislation.gov.uk/uksi/2015/668/contents/made>)

to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.152 The Urban Waste Water Treatment Regulations (2003)¹³¹: protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

B.153 The Water Environment Regulations (2016)¹³²: protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process.

B.154 The Water Supply (Water Quality) Regulations (2016)¹³³: focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.155 The Environmental Permitting Regulations (2016)¹³⁴: streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.156 The Air Quality Standards Regulations (2016)¹³⁵: set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.157 The Environmental Noise Regulations (2018)¹³⁶: apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at work places; inside means of transport; or military activities in military areas.

B.158 The Waste (Circular Economy) Regulations (2020)¹³⁷: seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.159 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)¹³⁸: sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

¹³¹ HM Government (2003). The Urban Waste Water Treatment Regulations. (see <https://www.legislation.gov.uk/ukksi/1994/2841/contents/made>)

¹³² HM Government (2016). The Water Environment (England and Wales) Regulations. (see <https://www.legislation.gov.uk/ukksi/2017/407/contents/made>)

¹³³ HM Government (2016). The Water Supply (Water Quality) Regulations. (see <https://www.legislation.gov.uk/wsi/2018/647/contents/made>)

¹³⁴ HM Government (2016). The Environmental Permitting Regulations. (see <https://www.legislation.gov.uk/ukksi/2016/1154/contents/made>)

¹³⁵ HM Government (2016). The Air Quality Standards Regulations. (see <https://www.legislation.gov.uk/ukksi/2010/1001/contents/made>)

¹³⁶ HM Government (2018). The Environmental Noise (England) Regulations. (see <https://www.legislation.gov.uk/ukksi/2006/2238/contents/made>)

¹³⁷ HM Government (2020). The Waste (Circular Economy) Regulations. (see <https://www.legislation.gov.uk/ukksi/2020/904/contents/made>)

¹³⁸ Department for Environment Food and Rural Affairs (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)

B.160 Safeguarding our Soils – A Strategy for England (2009)¹³⁹: sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

B.161 The Water White Paper (2012)¹⁴⁰: provides out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

B.162 National Policy Statement for Waste Water (2012)¹⁴¹: sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.163 Future Water: The Government's water strategy for England (2008)¹⁴²: sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.164 A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹⁴³: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

- Using and managing land sustainably:
- Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
- Protect best agricultural land.
- Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
- Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
- Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

B.165 The Environment Act 2021¹⁴⁴: is a key vehicle for delivering the bold vision set out in the 25 Year Environment Plan. An important aspect of the Environment Act is the power to set long-term, legally-binding environmental targets. Setting targets will provide a strong mechanism to deliver long-term environmental outcomes. It requires government to set at least one target in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction, as well as a target for fine particulate matter (PM2.5). These targets need to be brought forward by 31 October 2022. Long-term targets will be supported by interim targets, which will set a five year trajectory towards meeting the long-term targets.

¹³⁹ Department for Environment, Food and Rural Affairs (2009). Safeguarding our Soils: A Strategy for England. (see <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>)

¹⁴⁰ Department for Environment, Food and Rural Affairs (2012). The Water White Paper. (see <https://www.water.org.uk/water2050/>)

¹⁴¹ HM Government (2012). National Policy Statement for Waste Water. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

¹⁴² HM Government (2008). Future Water: The Government's water strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

¹⁴³ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

¹⁴⁴ The Environment Act (2021). (see https://www.legislation.gov.uk/ukpga/2021/30/pdfs/ukpga_20210030_en.pdf)

B.166 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)¹⁴⁵: sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESVs), a £290 million National Productivity

B.167 Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.168 Clean Air Strategy 2019 (2019)¹⁴⁶: sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.169 Department for Transport, The Road to Zero (2018)¹⁴⁷: sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.170 Our Waste, Our Resources: A strategy for England (2018)¹⁴⁸: aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

Sub-national

B.171 Kent Environment Strategy (2016)¹⁴⁹ sets the following targets in relation to the quality of the environment:

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

B.172 Kent and Medway Growth and Infrastructure Framework (GIF) (2015)¹⁵⁰: sets out the fundamental infrastructure needed to support housing and economic growth planned to 2031 across Kent and Medway. The document identifies issues with capacity for treating sewage arising from new houses at Whitfield.

B.173 Kent Minerals and Waste Local Plan 2013-30 (2016)¹⁵¹: describes (1) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent; and (2) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. It also contains a map showing whether the Minerals Safeguarding Areas are located within the District (see Current baseline). The most commonly safeguarded mineral in Dover is Brickearth, found across the District but particularly to the north-west of Deal.

¹⁴⁵ Department for Environment Food and Rural Affairs and Department for Transport (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

¹⁴⁶ DEFRA (2019). Clean Air Strategy 2019. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

¹⁴⁷ Department for Transport (2018). The Road to Zero. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

¹⁴⁸ Department for Environment Food and Rural Affairs and Environment Agency (2018). Resource and waste strategy for England. (see <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>)

¹⁴⁹ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

¹⁵⁰ Kent County Council (2015). Kent and Medway Growth and Infrastructure Framework. (see https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf)

¹⁵¹ Kent County Council (2016). Kent Minerals and Waste Local Plan 2013-30. (see <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy>)

B.174 River Basin Management Plan for the South East River Basin District (2009)¹⁵²: this plan outlines the pressures facing the water environment in the South East River Basin District and the actions which will be used to address them.

B.175 Climate Local Kent Commitment (n.d.)¹⁵³: this document highlights the role that Kent County Council has in helping residents capture the opportunities and benefits of action on climate change. This commitment pledges to:

- Set locally owned commitments and actions to reduce carbon emissions;
- Public actions and progress regularly;
- Share learning with other organisations; and
- Regularly refresh commitments and actions to ensure they are up to date and relevant.

B.176 Kent and Medway Shoreline Pollution Emergency Plan (2022)¹⁵⁴ outlines an overarching policy framework for coastal shoreline pollution planning and response in Kent and Medway. The objectives of this Plan are:

- To outline organisational responsibilities for shoreline pollution planning and response;
- To provide emergency points of contact;
- To determine relevant operational requirements of agencies in Kent;
- To ensure the availability of personnel for effective co-ordination and delivery of the response;
- To ensure that appropriate personnel are trained and exercised;
- To ensure that liaison takes place across key partners;
- To ensure effective planning for, and operational interventions to, pollution incidents impacting Kent's natural and built coastal environment; and
- To collate existing zonal shoreline access and sensitivity information and booming plans for Kent and Medway in one document.

Local

B.177 Dover Air Quality Action Plan (2020)¹⁵⁵: the aim of this Action Plan is to identify how Dover District Council will use its existing powers and work together with other organisations in pursuit of the annual mean Air Quality Objective for nitrogen dioxide (NO₂). Measures are proposed to improve air quality both within the AQMA and throughout the District as a whole. The direct measures proposed for the AQMA are:

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

¹⁵² Environment Agency (2009). Water for life and livelihoods: River Basin Management Plan South East River Basin District. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf)

¹⁵³ Kent County Council (n.d.). Climate Local Kent Commitment – Annex 1 (see <https://democracy.thanet.gov.uk/documents/s29928/Climate%20Local%20Kent%20Commitment%20-%20Annex%201.pdf>)

¹⁵⁴ Kent County Council (2022). Shoreline Pollution Emergency Plan. (see https://www.kent.gov.uk/_data/assets/pdf_file/0007/47806/Kent-and-Medway-Shoreline-Pollution-Emergency-Plan.pdf)

¹⁵⁵ Dover District Council (2020). Dover Air Quality Annual Status Report. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Home.aspx>)

- Transfer of freight from road to rail.

B.178 The general measures to improve air quality across the whole District are:

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

Current baseline

Air quality

B.179 The Kent Environment Strategy¹⁵⁶ highlights Kent's unique challenge presented by the county's position between London and the continent. Easterly winds can bring pollution from cross-channel freight and the continent and westerly winds bring pollution from London. There are currently 40 air quality management areas in the county where air pollutants have been known to exceed objectives set by Government.

B.180 There are currently two Air Quality Management Areas (AQMAs) declared in the District due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO₂, caused primarily by road traffic emissions. They are:

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

NO₂

B.181 For NO₂ there are two predicted exceedances of the AQS objective at specific receptors, all of which lie within existing AQMAs. As such, there are no new exceedance areas that the Council has not previously identified¹⁵⁷.

¹⁵⁶ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

¹⁵⁷ Bureau Veritas (2012). Air Quality Assessment in the Dover Area. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Air-Quality-Assessment-v4.pdf>)

B.182 There was one exceedance of the NO₂ annual mean objective in 2019, this was located outside of an AQMA at DV30 adjacent to 19B High Street Dover, slightly to the north of the High Street/Ladywell AQMA boundary. As this is the third year that an exceedance has been identified here, consideration is being given to extending the AQMA towards Victoria Crescent to include this area of exceedance.

PM10

B.183 The Air Quality Assessment found that there were no exceedances of PM10 AQS objective. As such, there is no requirement to declare an AQMA for this pollutant.

B.184 Figure B5 illustrates the location of the air quality management areas in the District.

B.185 An updated Air Quality Study assessing the likely implications of the Publication Local Plan's preferred development sites on local air quality has been undertaken by Bureau Veritas (2020). The work concludes that the implementation of mitigation measures in line with the Kent and Medway guidance should avoid or minimise air quality enough to eliminate the potential for significant adverse deterioration in local air quality.

Land quality

Agricultural land quality

B.186 A large proportion of Dover District is agricultural land, which is mainly used for arable farming¹⁵⁸.

B.187 The agricultural land in Sandwich is particularly important and recognised by the Agricultural Land Classification as Grade 1, 'the best and most versatile quality'. However, a significant area of this is at risk of flooding from both fluvial and tidal flooding. As well as good quality agricultural land, there are large areas of managed grassland and forestry within the District¹⁵⁹. Figure B6 illustrates the agricultural land classifications across the District.

Soils and minerals

B.188 The north, north-western and eastern sides of Dover District, north of Ash and south-east of Sandwich, are dominated by poor quality, heavy, Marine/Estuarine Alluvium clay, overlain by seasonally wet deep clay soils. The north-east coast of the District, adjacent to Sandwich Flats, comprises bands of Marine/Estuarine Alluvium and Storm Gravel Beach Deposits. Alluvial and peat soils surround the dykes and marshland of Hacklinge, as well as the land adjacent to the Little Stour River, along the north-western section of the District. A small section of peaty soil lies over the Alluvium bed to the west of Sholden, to the east of the District¹⁶⁰.

B.189 Head Brickearth dominates the west of the District around Stourmouth and Preston, overlain with seasonally wet deep loam to clay. Swathes of Thanet beds, Woolwich Beds and Head Brickearth cover the northern central area of the District, west of Sandwich, overlain again with seasonally wet deep loam to clay. Smaller patches of Clay with Flints appear amidst the swathes, adding to the variation with silty soil¹⁶¹.

B.190 The southern central section of the District, south and west of Deal and north of Dover, encompassing Aylesham, Kingsdown, Nonington and Sheperdswell, supports generally well drained, good quality chalk of varying depths and silty soil. A distinct pattern of narrow strips of dry valley and Nailbourne Deposits, and wider bands of Head, follow a northeast direction north of a band of Clay with Flints at the very south of the site. The band of Clay with Flints supports deep loam to clay soil. Shallow silty soils lie across the Upper Chalk at the very south of the site¹⁶².

¹⁵⁸ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

¹⁵⁹ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

¹⁶⁰ Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

¹⁶¹ Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

¹⁶² Jacobs Babbie (2006). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Landscape-Character-Assessment.pdf>)

B.191 The minerals that are safeguarded across the District are Brickearth, Sub-Alluvial River Terrace Deposits and Storm Beach Gravel. The most commonly safeguarded mineral is Brickearth, found across the District but particularly to the north-west of Deal.

Water resource

B.192 Dover District is located on the south coast of Kent, bordered by the English Channel for much of its boundary, the Stour Estuary to the north and Folkestone and Hythe District to the south. The District is underlain by chalk, which provides groundwater for public water supply. The following main rivers are located in Dover District: River Dour, River Wingham, River Stour, North Stream, South Stream, Delf, Penfield Sewer, Brook Stream and Minnis Sewer.

B.193 Drinking water is supplied wholly by groundwater sources from the underlying chalk in Kent. Dover is located in the Environment Agency's Stour Catchment Abstraction Management Strategy, which identifies that all the groundwater sources are over-abstracted.

B.194 The Kent Environment Strategy¹⁶³ names Kent as one of the driest regions in England and Wales. Kent's household water use is above the national average (154 litres per person per day compared with 141 litres nationally). Kent's water resources are under continued pressure requiring careful management and planning. Dover falls partly within the Dour Water Resource Zone (Affinity Water) and the Thanet Water Resource Zone (Southern Water), both of which will experience a shortfall in supply relative to demand up to 2031¹⁶⁴.

B.195 Future demand will be greatly affected by the water efficiency of new and existing homes. Southern Water and Affinity Water have undertaken detailed modelling work in order to account for proposed housing growth and environmental conditions and have published robust strategies outlining how they will accommodate growth in their respective catchments with a range of factors and future scenarios considered¹⁶⁵. Some water bodies within the Dover District have been classified by the Environment Agency as at Moderate or Serious Water Stress, meaning either the current household demand for water is high as a proportion of the current effective rainfall available to meet that demand; or, the future household demand is likely to be a high proportion of the effective rainfall available to meet that demand¹⁶⁶. While 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 Stress¹⁶⁷.

Water quality

B.196 The Dour was classified as 'Poor' in 2016, driven by a 'Poor' status for fish and a 'moderate' status for phosphate, a deterioration from 'moderate' scores in 2013 and 2014. The chemical status of the Dour had improved to 'good' after failing in this category in 2013 and 2014. The Dour's RNAGs included barriers, groundwater abstraction, and intermittent sewage discharge and misconnections.

B.197 The River Stour was also classified as 'Poor' in 2016, driven by 'poor' scores for ecology, fish, and high levels of pollutants. The main issues preventing the Stour reaching 'good' status were pollution from agriculture and physical modifications.

B.198 The Wingham and Little Stour were also classified as 'poor' in 2016, driven by poor ratings for fish and 'high' concentrations of pollutants. However the chemical status of the Wingham and Little Stour remained good throughout the monitoring period (2013-2016). Reasons for not achieving good status for the Wingham and Little Stour in 2016 were barriers to fish movement, poor phosphate status and groundwater abstraction leading to reduced flow, and ammonia from water industry point source pollution¹⁶⁸.

¹⁶³ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

¹⁶⁴ AECOM (2017). Kent Water for Sustainable Growth Study. (see https://www.medway.gov.uk/download/downloads/id/2374/kent_water_for_sustainable_growth_2017.pdf)

¹⁶⁵ Dover District Council (2020). Water Cycle Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

¹⁶⁶ AECOM (2017). Kent Water for Sustainable Growth Study. (see https://www.medway.gov.uk/downloads/file/2374/kent_water_for_sustainable_growth_2017)

¹⁶⁷ HM Government. Water Stressed Areas: 2013 classification. (see <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>)

¹⁶⁸ Dover District Council (2020). Water Cycle Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

B.199 Kent's Water for Sustainable Growth Study¹⁶⁹ demonstrates that a large proportion of water bodies in Kent are failing to meet the Water Framework Directive objective of 'Good Status'. This is due to a number of reasons such as pressures ranging from physical modification, to pollution and over-abstraction. The Environment Agency's River Basin Management Plans shows that despite measures completed over the last 6 years, that are providing some benefits, there has been a reduction in the number of water bodies with a 'good' status¹⁷⁰. Increases in wastewater flows are expected across Dover, following development. This is largely due to the expected reduction in both occupancy rates and per capita consumption. However, the Kent Water for Sustainable Growth Study (2016) identified that all the WwTWs in the District have sufficient capacity to accept the additional wastewater flow from forecast housing growth¹⁷¹.

B.200 In December 2019, Natural England issued guidance to Local Authorities within the Stour Catchment due to high levels of nitrogen and phosphorus in the water environment at Stodmarsh in neighbouring Canterbury. It is therefore recommended that all developments in the catchment should seek to deliver nutrient neutrality. This covers the north western corner of Dover District specifically the Little Stour and Wingham catchment and catchment of the Dambridge WwTW. The Council is therefore obtained hydrological advice to determine the significance of the hydrological connection between Dover District and Stodmarsh. The Stodmarsh Water Quality Modelling (2021)¹⁷² study seeks to determine if there is potential for a hydraulic connection enabling water discharged from Dambridge WwTW to reach Stodmarsh and enter the freshwater lakes. The study found there is potential for a connection between Dambridge WwTW and Stodmarsh under extreme conditions, including intermittent periods of high tidal range and low river flow when the propagation of tide upstream is greatest. However, the study highlights that when connectivity would occur, dilution would be so great that any nutrients released from the WwTW would be undetectable.

B.201 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.

B.202 Source Protection Zones 1-3 are located within the District, collectively protecting the District's water supply, rivers and aquifers from pollution. The majority of the zones are concentrated in the southern third of the District, with a significant concentration to the north and north-west of Dover. Figure B5 illustrates the location of the source protection zones in the District.

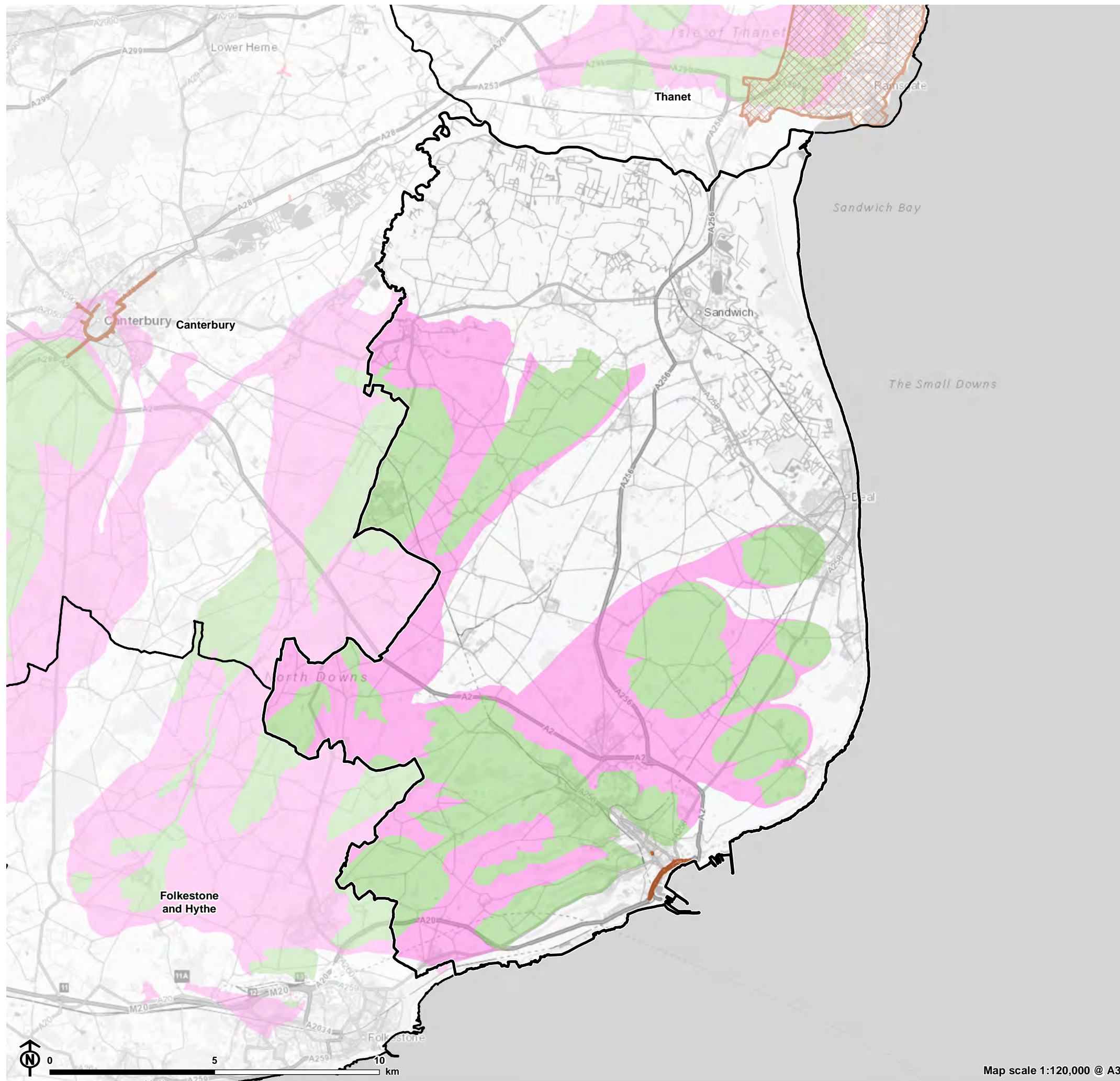
¹⁶⁹ AECOM (2017). Kent Water for Sustainable Growth Study. (see https://www.medway.gov.uk/download/downloads/id/2374/kent_water_for_sustainable_growth_2017.pdf)

¹⁷⁰ Environment Agency (2019). South East River Basin Management Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf)

¹⁷¹ AECOM (2017). Kent Water for Sustainable Growth Study. (see <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/water-cycle-study-2020.pdf>)

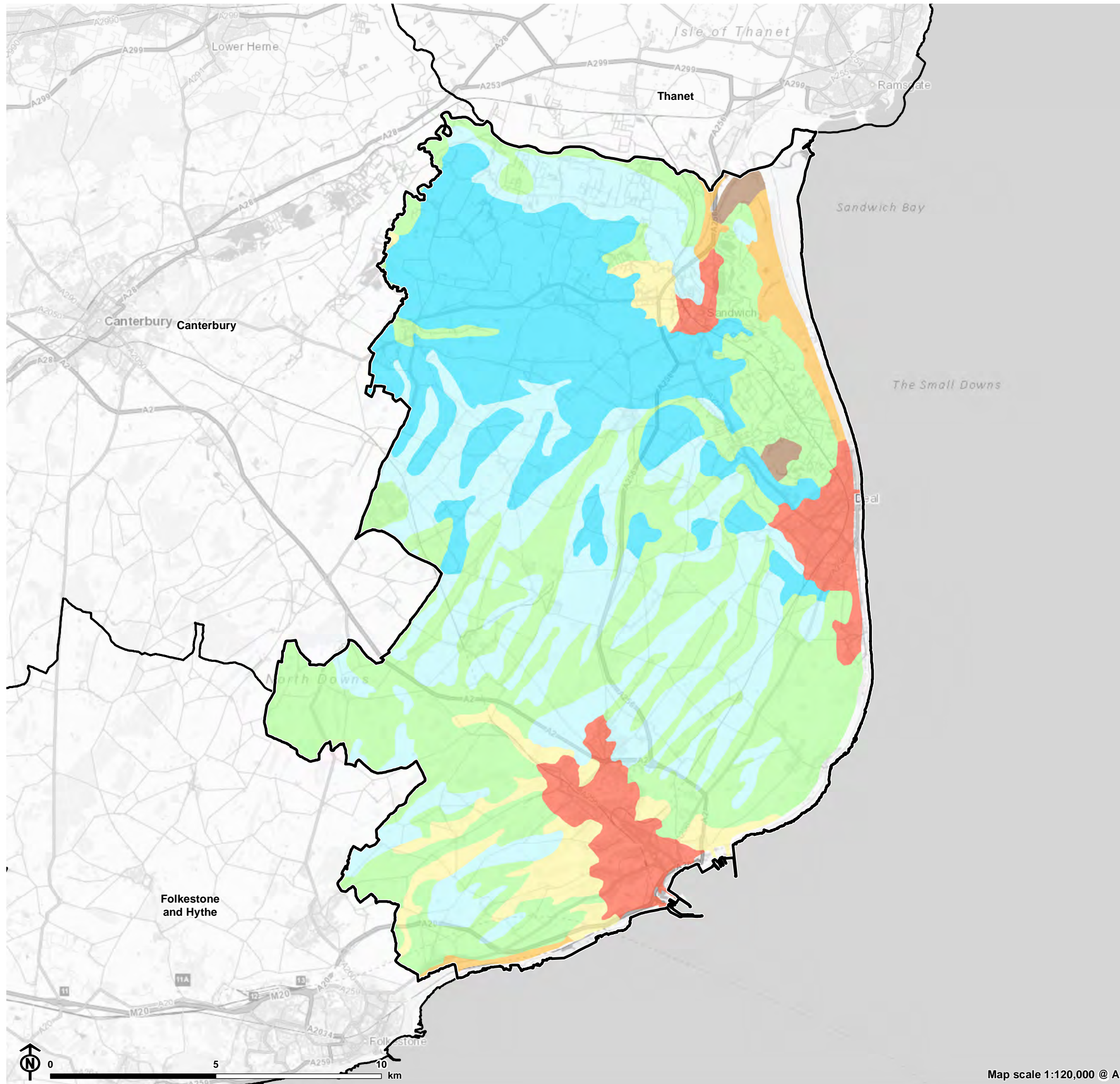
¹⁷² APEM Ltd (2021). Stodmarsh Water Quality Modelling Dover District County Council. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/P6031-River-Stour-Connectivity-Study-Nov2021.pdf>)

Figure B.5: Air Quality Management Areas and Source Protection Zones



- District boundary
- Neighbouring district boundary
- Air Quality Management Area
- Source Protection Zone**
 - Zone I - Inner protection zone
 - Zone II - Outer protection zone
 - Zone III - Total catchment
 - Zone of special interest

Figure B.6: Agricultural Land Classification



- District boundary
- Neighbouring district boundary
- Agricultural Land Classification**
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non agricultural
- Urban

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.203 Key sustainability issues facing the District are as follows:

- The District contains some of the county’s best and most versatile agricultural land, most notably around Sandwich, as well as many valuable mineral reserves. The Local Plan provides an opportunity to ensure that these natural assets are not lost or compromised by future growth in the District by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile (see SA objective 5).
- The District’s Source Protection Zones are concentrated in the southern third of the District, with a significant concentration of Zones to the north-west of Dover. The Local Plan provides an opportunity to direct inappropriate development away from Source Protection Zones (see SA objective 5).
- There are two Air Quality Management Areas in Dover District, which have been designated because these areas exceed the annual mean Air Quality Strategy objective for nitrogen dioxide caused primarily by road traffic emissions. The Local Plan provides an opportunity to set out measures to mitigate these exceedances without inhibiting the need for the District to grow (see SA objective 6).
- Groundwater sources in Dover District are over-abstracted. Dover falls within the Dour WRZ and Thanet WRZ, both of which will experience a shortfall in supply relative to demand up to 2031. A Local Plan provides an opportunity to ensure that water efficiency measures are implemented over the Plan period (see SA objective 5).
- Water bodies in Dover are failing to meet the Water Framework Directive objective of ‘Good Status’. A Local Plan provides an opportunity to implement plans to improve water quality (see SA objective 5).

B.204 Small increases in wastewater flows are expected across Dover District, following future development. However, the capacity of the sewerage network could pose a threat to meeting these future development needs, particularly in Whitfield, although work is underway to resolve these issues. The Local Plan provides an opportunity to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Whitfield area) is put in place (see SA objective 5).

SA objectives

Table B.5: Air, land and water quality SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA5: To promote sustainable forms of development that maintain and improve the quality of the District’s natural resources, including minerals, soils and waters.	<p>SA5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land?</p> <p>SA5.2: Does the Plan prioritise development of poorer quality agricultural land of the District’s best and most versatile agricultural land?</p> <p>SA5.3: Does the Plan minimise development in mineral safeguarding areas?</p> <p>SA5.4: Does the Plan direct inappropriate development away from Source Protection Zones?</p> <p>SA5.5: Does the Plan minimise water use?</p> <p>SA5.6: Does the Plan address capacity issues in the District’s wastewater infrastructure, most notably at Whitfield, and safeguard and enhance the quality of the District’s ground, surface and coastal waters?</p> <p>SA5.7: Does the Plan encourage the reuse and sourcing of local materials?</p> <p>SA5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</p>	<p>Soil</p> <p>Water</p> <p>Biodiversity</p> <p>Human Health</p> <p>Flora and Fauna</p> <p>Landscape</p>
SA6: To reduce air pollution and ensure	SA6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?	<p>Air</p> <p>Climatic Factors</p>

Appendix B
Detailed Sustainability and Policy Context

Publication Dover District Local Plan (Reg 19)
September 2022

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
air quality continues to improve.		Human Health

Climate change adaptation and mitigation

Policy context

International

B.205 United Nations Paris Climate Change Agreement (2015)¹⁷³: international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

B.206 National Planning Policy Framework (NPPF) (2021)¹⁷⁴: contains the following:

- One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.
- Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.
- Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

B.207 National Planning Practice Guidance (NPPG) (2021)¹⁷⁵: supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport. With regard to flood risk, a significant update was made to the NPPG in August 2022. The update follows the government's 'Review of policy for development in areas at flood risk'¹⁷⁶, which committed to a "significantly revised and updated" flood risk planning practice guidance. Changes were also made following reviews such as the Jenkins Review¹⁷⁷, Public Accounts Committee Review¹⁷⁸ and the EFRA Committee Review¹⁷⁹. According to the updated guidance:

- The Sequential Test has been expanded to include the requirement to assess all sources of flooding at medium and high-risk both now and in the future, including surface water. The test applies a hierarchical approach to locating development in areas at low-risk of flooding from any source, then medium-risk, then, as a last resort, high-risk areas.
- The Exceptions Test is to only be applied if the Sequential Test has shown that there are no reasonably available, lower-risk sites, suitable for the proposed development, to which the development could be steered. Wider sustainability benefits must be demonstrated, including multifunctional SuDS that significantly exceed the requirements of the NPPF, and a requirement to reduce overall flood risk to satisfy the test. Development must be made safe throughout its lifetime, without increasing flood risk elsewhere.
- Strategic Flood Risk Assessments should now also be used to inform the allocation of land to be safeguarded for future flood risk management, including natural flood management, particularly where development has the potential to prevent,

¹⁷³ UN (2015). Paris Climate Change Agreement. (see <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>)

¹⁷⁴ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

¹⁷⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

¹⁷⁶ Defra, MHCLG and the Environment Agency (2021). Review of policy for development in areas at flood risk. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1006735/Review_of_Policy_for_Development_in_areas_at_flood_risk.pdf)

¹⁷⁷ Defra (2021). Surface water and drainage: review of responsibilities. (see <https://www.gov.uk/government/publications/surface-water-and-drainage-review-of-responsibilities>)

¹⁷⁸ Public Accounts Committee (2021). Managing flood risk. (see <https://publications.parliament.uk/pa/cm5801/cmselect/cmpublic/931/93102.htm>)

¹⁷⁹ EFRA Committee (2021). Flooding. (see <https://publications.parliament.uk/pa/cm5801/cmselect/cmenvfru/170/17002.htm>)

hinder or help to enable their delivery. Further to this, they should inform policies for change of use and reducing the causes and impacts of flooding, whilst also demonstrating how the adaptation to climate change has been met.

- Requirements for on-site level-for-level compensatory storage where flood storage from any source of flooding is lost, and the need to safely manage flow routes within a site where these would be deflected or constricted by development.
- A presumption that all major developments will provide multifunctional SuDS and an expectation that major developments will provide evidence where multifunctional SuDS are not provided. There is an expectation that SuDS will reduce the causes and impacts of flooding, including reducing surface water loadings on the existing sewerage network, e.g. by incorporating runoff from adjacent developments into the SuDS, maximising infiltration, maximising planting and vegetated areas and providing additional attenuation beyond the minimum requirements.
- Stronger guidance on multifunctional SuDS. The definition of multifunctional SuDS is expanded beyond the '4 pillars' (i.e. water quantity, water quality, amenity and biodiversity), including contributing to biodiversity net gain, sequestering carbon and reducing urban heating and air pollution.
- New guidance on natural flood management, with an expectation that strategic plans and new development will deliver natural flood management, with local planning authorities using planning conditions and obligations to secure it.
- New guidance on flood resistance and resilience measures, where it is not possible to avoid areas at risk of flooding from any source.

B.208 Planning Act 2008¹⁸⁰: The Planning Act 2008 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018. Section 182 places a legal duty on local planning authorities to ensure that their development plan documents include policies to ensure that development and use of land in their area contributes to the mitigation of, and adaptation to, climate change.

B.209 Planning and Energy Act 2008¹⁸¹: enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

B.210 Climate Change Act 2008¹⁸²: sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline.

B.211 The Energy Performance of Buildings Regulations (2021)¹⁸³: seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.212 The Flood and Water Management Act 2010¹⁸⁴: sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.213 The UK Renewable Energy Strategy (2009)¹⁸⁵: sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

¹⁸⁰ HM Government (2008). Planning and Energy Act 2008. (see <https://www.legislation.gov.uk/ukpga/2008/21>)

¹⁸¹ HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

¹⁸² HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

¹⁸³ HM Government (2021). The Energy Performance of Buildings Regulations. (see <https://www.legislation.gov.uk/uksi/2021/3118/contents/made>)

¹⁸⁴ HM Government (2010). Flood and Water Management Act 2010. (see http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf)

¹⁸⁵ HM Government (2009). The UK Renewable Energy Strategy. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf)

B.214 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)¹⁸⁶: aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.215 The Flood and Water Management Act 2010¹⁸⁷ and **The Flood and Water Regulations (2011)**¹⁸⁸: sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.216 The Net Zero Strategy: Build Back Greener (2021)¹⁸⁹ sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.217 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)¹⁹⁰: sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

B.218 UK Climate Change Risk Assessment (2017)¹⁹¹: sets out six priority areas needing urgent further action over the next five years in order to minimise risk from the effects of climate change. These priority areas include: flooding and coastal change risk to communities, businesses and infrastructure; risks to health, wellbeing and productivity from high temperatures; risk of

¹⁸⁶ Department of Energy & Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf)

¹⁸⁷ HM Government (2010). Flood and Water Management Act. (see <https://www.legislation.gov.uk/ukpga/2010/29/contents>)

¹⁸⁸ HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

¹⁸⁹ Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see <https://www.gov.uk/government/publications/net-zero-strategy>)

¹⁹⁰ HM Government (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

¹⁹¹ HM Government (2017). UK Climate Change Risk Assessment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

shortages in the public water supply and for agriculture, energy generation and industry; risks to natural capital; risks to domestic and international food production and trade; and new and emerging pests and diseases and invasive species.

B.219 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)¹⁹²: this Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.220 A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹⁹³: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.221 The national flood and coastal erosion risk management strategy for England (2011)¹⁹⁴: this Strategy builds on existing approaches to flood and coastal risk management and promotes the use of a wide range of measures to manage risk. The strategy forms the framework within which communities have a greater role in local risk management decisions and sets out the Environment Agency's strategic overview role in flood and coastal erosion risk management.

B.222 The Environment Act 2021¹⁹⁵ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

¹⁹² HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

¹⁹³ HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

¹⁹⁴ Environment Agency (2011). Understanding the risks, empowering communities, building resilience. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

¹⁹⁵ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

B.223 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)¹⁹⁶: this Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.224 The 25 Year Environment Plan (2020)¹⁹⁷ sets out policy priorities with respect to: responding to climate change and using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.225 The UK Low Carbon Transition Plan: national Strategy for Climate and Energy (2009)¹⁹⁸: sets out a five point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.226 The Industrial Decarbonisation Strategy (2021)¹⁹⁹: aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

B.227 The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions.

B.228 Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions;
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass;
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors;
- To ensure the land planning regime is fit for building low carbon infrastructure;

¹⁹⁶ HM Government (2011). Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf)

¹⁹⁷ Defra (2021). A Green Future: Our 25 Year Plan to Improve the Environment. (see <https://www.gov.uk/government/publications/25-year-environment-plan>)

¹⁹⁸ HM Government (2009). The UK Low Carbon Transition Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)

¹⁹⁹ Department for Business, Energy & Industrial Strategy (2021). Industrial decarbonisation strategy. (see <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

- Support the skills transition so that the UK workforce benefits from the creation of new green jobs;
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030;
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.229 The **Heat and Buildings Strategy (2021)**²⁰⁰ sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

B.230 Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.231 The **UK Hydrogen Strategy (2021)**²⁰¹: sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030.

B.232 The **Energy White Paper: Powering our net zero future (2020)**²⁰²: builds on the Prime Minister's Ten point plan for a green industrial revolution.

B.233 The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

²⁰⁰ Department for Business, Energy & Industrial Strategy (2021). Heat and buildings strategy. (see <https://www.gov.uk/government/publications/heat-and-buildings-strategy>)

²⁰¹ Department for Business, Energy and Industrial Strategy (2021). UK Hydrogen Strategy. (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

²⁰² Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

B.234 Key aims of the paper include:

- Supporting green jobs - The government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system - To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable - The government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 - The government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme - The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options - The government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind - The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments - Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy - The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points- The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills - The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers - The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition - The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

B.235 Flood and Coastal Erosion Risk Management: Policy Statement (2020)²⁰³: This policy statement sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure
- Managing the flow of water more effectively
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits

²⁰³ HM Government (2020). Flood and coastal erosion risk management: policy statement. (see <https://www.gov.uk/government/publications/flood-and-coastal-erosion-risk-management-policy-statement>)

- Better preparing our communities

B.236 Enabling more resilient places through a catchment-based approach

Sub-national

B.237 Kent Environment Strategy (2016)²⁰⁴: sets the following targets in relation to climate change mitigation and adaptation:

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

B.238 River Stour Catchment Flood Management Plan (2009)²⁰⁵: an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years. The District of Dover falls within five of the nine sub-areas outlined in the Plan but mostly within the 'Isle of Thanet and Rest of Catchment' sub-area. The following is relevant:

- Nailbourne and Little Stour: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.
- Lower Stour: Areas of low to moderate flood risk where action is being taken to store water and manage run-off in locations that provide overall flood risk reduction or environmental benefits.
- Sandwich Bay: Areas of low to moderate flood risk where flood risk is currently being managed effectively.
- Dour and Pent: Areas of low, moderate or high flood risk where flood risk is currently being managed effectively but further action is required to keep pace with climate change.
- Isle of Thanet and the rest of catchment: Areas of little or no flood risk.

B.239 The British energy security strategy (2022)²⁰⁶ sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plan to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.

²⁰⁴ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

²⁰⁵ Environment Agency (2009). River Stour Catchment Flood Management Plan. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293884/Stour_Catchment_Flood_Management_Plan.pdf)

²⁰⁶ Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022) British energy security strategy (see <https://www.gov.uk/government/publications/british-energy-security-strategy>)

- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

Local

B.240 Dover Surface Water Management Plan (2011)²⁰⁷: identifies sustainable responses to manage surface water flooding and sets out an Action Plan for Dover to inform future decision making. These include the following:

- Improve property resistance/resilience for identified properties on Folkestone Road, East Street and Maison Dieu Road.
- Improve property resistance/resilience for additional selected properties on Folkestone Road and in Tower Hamlets (e.g. Tower Hamlets Street and De Burgh Street).
- Improve property resistance/resilience for selected properties on Crabble Avenue and along Coombe Valley Road.
- Improve property resistance for the properties adjacent to the NHS establishment on the south side of London Road by raising kerbs between the junctions of Kearsney Avenue and Alkham Road.
- Attenuate upstream flows in a detention basin in Buckland Valley Sports Ground. Route exceedance flows along Glenfield Road, Brookfield Avenue and Old Park Road. Raise pedestrian crossing at junction of Crabble Hill and Buckland Avenue to direct flow into the River Dour. Improve property resistance/resilience along route as required.
- Route exceedance flows from Frith Road into the River Dour adjacent to Morrison's supermarket, and route exceedance flows from Maison Dieu Road into (i) the River Dour via Crafford Street and (ii) a pond, wetland or underground storage sited in the existing Maison Dieu Road car park. Improve property resistance/resilience along route as required.
- Fit tide-excluding gates at outlet of Wellington Dock. Manage tide levels in the dock during periods of high river flow to maintain low tide levels and improve conveyance in the Dour Channel.
- Attenuate upstream flows in a detention basin, pond or wetland as part of redevelopment of Great Farthingloe. Route exceedance flows from Folkestone Road into a pond or wetland sited adjacent to the Government Immigration Buildings off St John's Road as part of any redevelopment.
- Route exceedance flows along Coombe Valley Road and Lorne Road and into the River Dour, with an off-line detention basin or pond at the Buckland Hospital site as part of site redevelopment. Improve property resistance/resilience along route as required.
- Improve property resistance/resilience for low threshold properties along High Street.
- Increase storage of flows in the River Dour in the existing ponds at Kearsney.
- Improve property resistance/resilience measures for selected properties in the valley between Cowper Road and Common Lane.
- Route exceedance flows down Minnis Lane and into the River Dour on the upstream side of Minnis Lane. Improve property resistance/resilience along route as required.

Current baseline

Climate change adaptation

B.241 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP18) builds on the success of the UKCP09 which showed that in 2050 the climate in the South East will be warmer with wetter winters and drier summers than at present²⁰⁸. The UKCP18 found that the largest warming in the UK will be in the South East where summer temperatures may increase another 3 to 4°C relative to present day, while median

²⁰⁷ Jacobs (2011). Dover Surface Water Management Plan. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Surface-Water-Management-Plan.pdf>)

²⁰⁸ UK Climate Projections (2018). Fact Sheet. (see <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-temperature.pdf>)

increases throughout the year are at least 1 to 2°C across the whole country. A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species.

Flood risk

B.242 Kent has the highest risk of local flooding of all local authorities in England and surface water flooding is estimated to affect 76,000 properties in Kent, of which approximately 60,000 are residential. Kent is also currently estimated to have approximately 64,000 properties at risk of river and coastal flooding, of which approximately 46,000 are residential²⁰⁹.

B.243 Flood risk to the District is dominated by tidal flooding, although the settlements of Dover and Sandwich have the additional risk of fluvial flooding, from the River Dour and River Stour, respectively. In 2016, Sandwich Town had a tidal flood defence built which will protect the town from both fluvial and tidal flooding. In the lower lying areas of the District, groundwater is another primary source of flooding, as a result of the predominant chalk geology or where ground water springs have formed. High concentrations of springs can be found in and around the Dour Valley, as well as a band running from Deal, to Ash and up to Preston. Additionally, much of the coastal plain area is characterised by marshy areas made up of a series of drains, presenting a different type of flood risk²¹⁰.

B.244 The fluvial topography of the region is characterised by valleys which are typically 'u-shaped' with very flat bottoms and steep valley sides. This landscape character has an impact on flooding in the region as the extent is constrained by the steep valley sides, so once the valley bottom is inundated with water, any further increases in flooding generally leads to greater depths rather than an increase in the spatial extent²¹¹.

B.245 There is demonstrable history of surface water and groundwater flooding across the urban area of Dover, for example in June 2007 and the winter of 2000/1.

B.246 In addition to Dover's three main towns (Dover, Deal and Sandwich), the settlement of Whitfield also lies outside of the Flood Risk Zone. Figure B7 illustrates the location of flood risk zones in the District. The three main towns are most likely to experience sewer flooding, due to reliance on extensive sewer networks²¹².

Tidal flooding

B.247 The main sources of flooding in the Dover District are the sea and, to a lesser extent the River Dour through Dover and the River Stour through Sandwich. The Dover District coastline is particularly vulnerable to exceptional sea levels arising from a combination of high tides, storm surge, action of exceptional wave heights and the joint impacts of fluvial and tidal levels (particularly through Sandwich on the River Stour)²¹³.

B.248 The most severe flooding would be through either a breach in coastal defence structure or through the defence structure overtopping. The District has 33km of coastline, of which 26km benefits from formal sea defences. The area at greatest risk of flooding is north Deal, where the coastal defence structures are at greatest risk of breaching. In addition, the collection of spray-water from waves crashing against the coastal defences in Deal provides a flood risk in itself. The landscape slopes away from the coastline towards the centre of Deal and multiple roads adjacent to the coastline are orientated perpendicular to the shoreline. Flooding along watercourses in urban areas can, in some cases, be associated with the surcharge of subsurface drainage systems or the blockage of structures (e.g. culverts, outfalls or bridges)²¹⁴.

²⁰⁹ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

²¹⁰ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

²¹¹ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

²¹² Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

²¹³ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

²¹⁴ Herrington Consulting Ltd (2019). Strategic Flood Risk Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf>)

Surface water flooding

B.249 Surface water flooding in Dover could be caused by intense rainfall before it enters the River Dour or sewer network, overland flow resulting from high groundwater levels, exceedance of the capacity of the surface water or combined sewer networks and 'out of bank flow' from open-channel or culverted sections of the River Dour which results from runoff within the urban area²¹⁵.

B.250 There are some significant natural drainage paths entering the urban area from the surrounding chalk valleys. Although these are typically dry, they could become conduits for surface water flow during intense rainfall and/or when the surrounding chalk hills become saturated or frozen. A number of these flowpaths are down steep roads. The velocity of flow could present a significant hazard.

B.251 The River Dour channel is complex with numerous culverted sections. It is severely constrained and includes potential obstructions to high flows. There are numerous surface water drains discharging into the River Dour which could become 'tide-locked' by high levels in the River Dour.

B.252 Dover District, in partnership with the Environment Agency and Kent County Council have acted to improve Deal sea defences for 1,250 properties reducing the risk of coastal flooding from once in every 20 years to once in every 300 years. This has been achieved through installing a 200m rock revetment and splash wall at Sandown Castle²¹⁶.

Climate change mitigation

B.253 The Government publishes data on the CO₂ emissions per capita in each local authority that are deemed to be within the influence of local authorities. Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline (current progress is a 21% reduction since 2005). In the context of planned growth of Kent's population and housing development, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure Kent meets their targets and benefits from the opportunities for innovation in these sectors. Some 80% of the housing stock that will be used over the next few decades is already in place and so opportunities to retrofit energy technologies and support a change to low carbon lifestyles will be key to supporting residents in reducing costs and improving energy security²¹⁷.

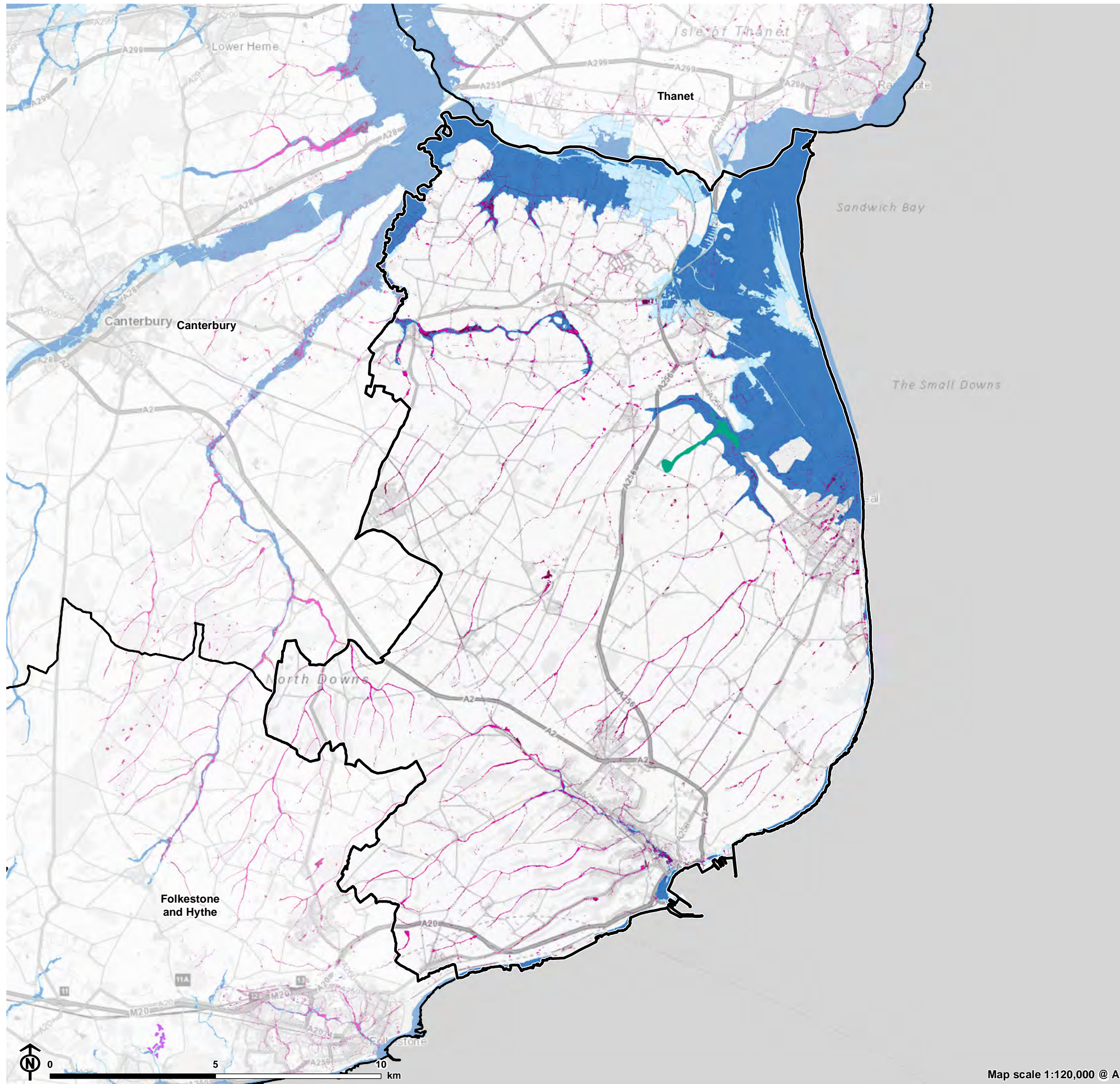
B.254 The latest available data shows that CO₂ emissions per capita in Dover fell by 28.9% over 2005-2013 although this masks widely different falls in the three broad sectors measures: Industry and Commercial -40.7%, Domestic -14% and Transport -11.8%.

²¹⁵ Herrington Consulting Ltd (2019). Site-specific Guidance for Managing Flood Risk. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Site-Specific-Guidance-for-Managing-Flood-Risk-March-2019.pdf>)

²¹⁶ Low Carbon Kent (2013). Climate Local Kent – One Year On: Progress Report 2013. (see http://www.kent.gov.uk/_data/assets/pdf_file/0014/10670/Climate-Local-Kent-Report-2013.pdf)

²¹⁷ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

Figure B.7: Flood Risk



- Neighbouring district boundary
- District boundary
- Flood storage area
- Flood zone 2
- Flood zone 3
- Risk of flooding from surface water (1 in 30 years)
- Risk of flooding from surface water (1 in 100 years)
- Updown Reservoir

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.255 Key sustainability issues facing the District are as follows:

- Hotter, drier summers expected under climate change have the potential for adverse effects on human health. A Local Plan offers another opportunity to update the District's approach to managing the effects of the changing climatic and associated weather events, particularly in the design of new buildings and green infrastructure (see SA objective 7).
- Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks can be managed effectively through the Local Plan and any associated update to the Council's Green Infrastructure Strategy (see SA objective 7).
- Flood risk to Dover District is dominated by tidal flooding, particularly to the north of Deal, where the coastal defence structures are at greatest risk of breaching. The expected magnitude and probability of significant fluvial, tidal ground and surface water flooding is increasing in the District due to climate change. The Local Plan offers an opportunity to contribute further to mitigate the potential effects of flooding by avoiding development in areas vulnerable to flood risk (see SA objective 7).
- The District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Furthermore, the location of new development within a sustainable pattern of development is also key to addressing the climate change challenge (see SA objective 8).

SA objectives

Table B.6: Climate change and flood risk SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change.	SA7.1: 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? SA7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure?	Water Soil Climatic Factors Human Health
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	SA8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat? SA8.2: Does the Plan promote and facilitate the use of electric cars, sustainable patterns of development and sustainable modes of transport.	Water Soil Climatic Factors Human Health

Biodiversity

Policy context

International

B.256 International Convention on Wetlands (Ramsar Convention) (1976): international agreement with the aim of conserving and managing the use of wetlands and their resources.

B.257 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979): aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.258 International Convention on Biological Diversity (1992): international commitment to biodiversity conservation through national strategies and action plans.

B.259 United Nations Declaration on Forests (New York Declaration) (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.260 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)²¹⁸: international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

National

B.261 National Planning Policy Framework (NPPF) (2021)²¹⁹: encourages plans to “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.

B.262 The NPPF states that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is also to be supported through planning policies and that there should also be support for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

B.263 National Planning Practice Guidance (NPPG) (2021)²²⁰: supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

B.264 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019²²¹ protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.265 Natural Environment and Rural Communities Act 2006²²²: places a duty on public bodies to conserve biodiversity.

B.266 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (2011)²²³: guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological

²¹⁸ COP26 (2021). United Nations Declaration on Forests and Land Use.

²¹⁹ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

²²⁰ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

²²¹ HM Government (2019). The Conservation of Habitats and Species Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules>)

²²² HM Government (2006). Natural Environment and Rural Communities Act 2006. (see http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf)

²²³ Department for Environment, Food and Rural Affairs (2011). Biodiversity 2020: A strategy for England’s wildlife and ecosystem services. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

B.267 England Biodiversity Strategy Climate Change Adaptation Principles (2008)²²⁴: sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpins all of these.

B.268 Biodiversity offsetting in England Green Paper (2013)²²⁵: biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.269 A Green Future: Our 25 Year Plan to Improve the Environment (2018)²²⁶: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
- Support and protect international forests and sustainable agriculture.

B.270 The Environment Act 2021²²⁷ is a key vehicle for delivering the bold vision set out in the 25 Year Environment Plan. An important aspect of the Environment Bill is the power to set long-term, legally-binding environmental targets. Setting targets will provide a strong mechanism to deliver long-term environmental outcomes. It requires government to set at least one target in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction, as well as a target for fine particulate matter (PM2.5). To ensure the delivery of Biodiversity Net Gain (BNG), the Environment Act 2021 introduced a requirement that all applications for the development of land will have to deliver a 10% biodiversity net gain above the ecological baseline for the application site. The Act also introduces Local Nature Recovery Strategies which will guide the delivery of biodiversity net gain projects. The spatial extent of these Strategies is to be determined by the Secretary of State. The implementation of these new initiatives will ensure that new development contributes towards the delivery of net gains in biodiversity, so that the environment, across the district as a whole, is improved by the end of the plan period. The requirements of the Environment Act will come into force in 2023 following a two-year transition period to enable local planning authorities, developers and others to prepare for the proposed requirement.

²²⁴ Department for Environment, Food and Rural Affairs (2008). The England Biodiversity Strategy Climate Change Adaptation Principles. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-eps-ccap-081203.pdf)

²²⁵ Department for Environment, Food and Rural Affairs (2013). Biodiversity offsetting in England Green Paper. (see https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf)

²²⁶ HM Government (2018). A Green Future: Our 23 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

²²⁷ GM Government (2021). The Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

Sub-national

B.271 South East Marine Plan (2021)²²⁸: the South East Marine Plan stretches from Felixstowe in Suffolk to near Folkestone in Kent, covering approximately 1,400km of coastline, taking in a total of approximately 3,900km² of sea. The Plan provides a policy framework that will be used to help inform decision-making on what activities take place in the marine environment and how the marine environment is developed, protected and improved in the next 20 years. The Plan will help businesses realise the economic benefits available from the marine plan area whilst ensuring the marine environment remains protected. This will be achieved through its thirteen objectives, the use of natural capital and supporting local policies – all of which have been developed in partnership with local and national organisations, representatives and users of the area.

B.272 Kent Environment Strategy (2016)²²⁹ sets the following targets in relation to biodiversity:

- A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable recovery by 2020.
- 60% of local wildlife sites will be in positive management and 95% of.
- SSSIs will be in favourable or recovering status by 2020.
- Status of bird and butterfly species in Kent and Medway are quantified.
- Complete a natural capital assessment for Kent by 2017.

B.273 These targets are supported through the **Kent Environment Policy (2020)**²³⁰, which is monitored through the Council's environmental management system.

B.274 Kent Net Zero Action Plan (n.d.)²³¹ outlines the different ways in which Kent County Council will achieve net zero by 2030, some of which include developing, testing and implementing an Environment and Climate Change Impacts Assessment, developing minimum design standards for new build projects, reducing business miles and encouraging the use of electric vehicles, e.g. through an electric only car scheme. The Council will embed net zero targets within appropriate procurement contracts and improve active travel facilities, whilst also rolling out LED lighting in KCC buildings where practicable.

B.275 Kent Biodiversity Action Plan (2011)²³²: 28 Kent Habitat Action Plans. Each Plan denotes the importance of conserving, enhancing and restoring the natural condition of a habitat by working together on projects.

B.276 Kent Nature Partnership Biodiversity Strategy 2020 to 2045 (2020)²³³: sets out the contribution the county of Kent and the partnership can make to the Government's ambition to leave our environment in a better state than we found it and its aspirations set out in the 25 Year Environment Plan.

B.277 A Living Landscape for the South East (2006)²³⁴: sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The documents highlights the following issues:

- There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide ('ecosystem services'). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.
- Better access to the natural environment helps improve mental and physical health, and improves quality of life. There is a need to bring wild places to more people, and bring more people into wild places.

²²⁸ Marine Management Organisation (2021). South East Marine Plan. (see <https://www.gov.uk/government/collections/south-east-marine-plan>)

²²⁹ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

²³⁰ Kent County Council (2020). Environment Policy. (see https://www.kent.gov.uk/_data/assets/pdf_file/0004/10669/KCC-Environmental-Policy.pdf)

²³¹ Kent County Council (n.d.). Net Zero Plan. (see https://www.kent.gov.uk/_data/assets/pdf_file/0017/122291/KCC-Net-Zero-action-Plan.pdf)

²³² Kent BAP (2011). Kent Biodiversity Action Plan. (see <http://www.kentbap.org.uk/>)

²³³ Kent Nature Partnership (2020). Biodiversity Strategy 2020 to 2045. (see <https://kentnature.org.uk/wp-content/uploads/2022/01/Kent-Biodiversity-Strategy-2020.pdf>)

²³⁴ The South East Wildlife Trusts (2006). A Living Landscape for the South East. (see http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf)

- Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.
- Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

B.278 Green Infrastructure Strategy (2014)²³⁵: the District Green Infrastructure (GI) Strategy sets out a framework for protecting, managing, enhancing and increasing the District's GI and for ensuring that the quality of provision is maintained and enhanced in light of the significant housing growth forecast for the District. The GI Strategy concludes that the importance of Kearsney Abbey, Russell Gardens and Bushy Ruff remains an outstanding priority, particularly given its appeal to a wider public. Satisfaction levels with both the number and quality of GI spaces across the District are high. Deal beach and Kearsney Abbey are the most popular locations, followed by St Margaret's and the White Cliffs. The results indicate that residents primarily use GI assets close to their homes rather than travel across the District. The District is in the process of updating its Green Infrastructure Strategy to inform the Local Plan. Once the assessment is complete, its findings will be incorporated into the SA.

B.279 Securing the value of nature in Kent (2011)²³⁶: explains the benefits of harnessing the value of nature to support business and economy, public health and productive and environmental management.

B.280 An East Kent Approach to Green Infrastructure and Recreation (2014)²³⁷: sets out to inform a future co-operative working by the Local Planning Authorities, both as part of the East Kent Green Infrastructure Partnership (EKGIP) and as a working group of planning authorities. It intends to provide background information to help guide the future direction of EKGIP.

B.281 Kent's Plan Bee Pollinator Action Plan (2019)²³⁸: is a pollinator action plan which seeks to encourage local communities to improve the food sources and general habitat for pollinators in Kent. The purpose of the plan is to:

- Make the council a community leader in action for pollinators;
- Ensure that pollinators' needs are always considered throughout our work and services;
- Put the conservation of pollinators and their habitats at the heart of land management and planning; and
- Make the council a significant contributor to the recovery of pollinator populations.

B.282 Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM) (2021)²³⁹: provides a strategy to mitigate the potential in-combination impacts of new housing development in the vicinity of the Thanet Coast and Sandwich Bay Special Protection Area (SPA) arising from the Dover District Local Plan. Specifically, preventing an increase in bird disturbance from recreational activity arising through increases in houses. The document proposes a SAMM officer role to deliver the strategy and to carry out engagement with visitors, landowners and the wider community, a new partnership of landowners in the Bay, on-site signage, online and information campaigns, and monitoring of birds and visitors.

Current baseline

Biodiversity

B.283 Kent did not meet its Biodiversity 2010 targets and with biodiversity continuing to decline, it is likely that Kent will also fail to meet the 2020 targets. Although there have been real gains for wildlife in some areas, there is still a gradual loss of habitats and species in the county, for example of the Local Wildlife Sites monitored over the past five years, 30% have been damaged

²³⁵ Dover District Council (2014). Green Infrastructure Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf>)

²³⁶ Pape, D and Johnston, J (2011). Securing the value of nature in Kent. (see http://www.kentbap.org.uk/images/uploads/Securing_the_Value_of_Nature_in_Kent.pdf)

²³⁷ Val Hyland Consulting and Blackwood Bayne Consulting (2014). An East Kent Approach to Green Infrastructure and Recreation. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/An-East-Kent-Approach-to-Green-Infrastructure-and-Recreation-Report-April-2014.pdf>)

²³⁸ Kent County Council (2019). Kent's Plan Bee: Kent County Council's Pollinator Action Plan. (see <https://www.kent.gov.uk/environment-waste-and-planning/nature-and-biodiversity/pollinators/kents-plan-bee-pollinator-action-plan>)

²³⁹ Dover District Council (2021). Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy (SAMM). Unpublished.

and 2% lost. This represents a significant threat to the intrinsic value of Kent's natural environment and to the economic and social benefit that it provides²⁴⁰.

B.284 Associated with the landscape of the District are some important wildlife sites – three terrestrial Special Areas of Conservation (SAC), one Special Protection Area (SPA) and Ramsar site, two National Nature Reserves (NNR) and over fifty Sites of Nature Conservation Interest (SNCI). Two of the three SACs (Sandwich Bay and Dover to Kingsdown Cliffs) are located along the coast, while the other (Lydden & Temple Ewell Downs) is located in the south west of the District.

B.285 The Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC Visitor Surveys²⁴¹ were conducted to determine the area from which visitors to the SACs originate. Managing visitor access and numbers is vital to preventing an adverse impact on the integrity of the fragile chalk grassland ecosystems of these landscapes. The study found that both sites are very different in terms of visitation, specifically the origin of visitors, group composition, activity and frequency of visits. According to the study, most visitors travelling from home originate from Dover District. Most of the visitors to Lydden Temple Ewell SAC travel from home for their visit (96%), on foot (74%) and for daily exercise or dog walking purposes. The profile of visitors to Dover to Kingsdown Cliffs SAC was markedly different. Nearly half of the visitors to Dover to Kingsdown Cliffs SAC were on holiday, 42% were first time visitors, and 32% traveled to the cliffs by foot. The majority of people at Lydden Temple Ewell (80%) stated they visit regularly throughout the year, with 74% visiting at least once a week compared to just 9% at Dover to Kingsdown. However, the length of stay was greater at Dover to Kingsdown, with 53% of people staying more than 2 hours, compared to 14% at Lydden Temple Ewell.

B.286 Dog walking was the main activity at Lydden Temple Ewell (78% of visitors) compared to 14% dog walkers at Dover to Kingsdown. The proportion of dogs off the lead was much higher at Lydden Temple Ewell (83%) compared to Dover to Kingsdown (16%). In terms of biodiversity, 65% of visitors to Lydden Temple Ewell saw information on site boards, compared to 44% at Dover to Kingsdown.

B.287 An ongoing visitor disturbance study²⁴² at the SPA and Ramsar site (Thanet Coast & Sandwich Bay) shows that recreational impacts are having an adverse impact on the species for which the SPA/Ramsar has been designated. The major concern is that of disturbance to over-wintering birds, particularly their ability to feed and, consequently, resulting adverse effects on their breeding performance. The Thanet Coast and Sandwich Bay SPA Strategic Access Monitoring and Mitigation Strategy²⁴³ states that whilst development in Dover is unlikely to have a significant impact on Pegwell Bay it may impact Sandwich Bay, and highlights that recreational activity, particularly dog walking, causes harmful disturbance to such bird species. The strategy notes that recreational activity is very likely to increase as a result of the increase in housing numbers that the Local Plan will deliver. In response to this, financial contributions will be sought for new residential development coming forward within the 9km Zone of Influence.

B.288 The Stodmarsh SPA, RAMSAR and SAC complex is located close to the north western edge of the District in neighbouring Canterbury. Stodmarsh is sensitive to increases in phosphorus and nitrogen reducing water quality. Developments in the immediate vicinity of the marsh are being sought to achieve nutrient neutrality. The Stodmarsh Water Quality Modelling²⁴⁴ study seeks to determine if there is potential for hydraulic connection enabling water discharged from Dambridge WwTW (which includes nitrogen and phosphorus nutrients) to reach Stodmarsh and enter the freshwater lakes, and potentially effect biodiversity in these areas. The study found that whilst there is potential for connection between Dambridge WwTW and Stodmarsh under extreme conditions, it is generally limited to intermittent periods of high tidal range and low river flow when the propagation of tide upstream is greatest. However, the study highlighted that when connectivity does occur, dilution would be so great, that any nutrients released from the WwTW would be undetectable, and therefore are unlikely to affect local biodiversity.

B.289 The findings of the HRA will be taken into account in the SA where relevant.

B.290 There are five SSSIs in the District:

- Alkham, Lydden and Swingfield Woods (76.56% favourable condition).

²⁴⁰ Kent County Council (2016). Kent Environment Strategy. (see http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

²⁴¹ Blackwood Bayne (2021). Visitor Surveys Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC July-August 2021. Unpublished.

²⁴² Strategic Marketing (2012). Dover Visitor Survey: Pegwell Bay and Sandwich Bay. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-Visitor-Survey-Pegwell-Bay-and-Sandwich-Bay-2012.pdf>)

²⁴³ Dover District Council (2021). Thanet Coast and Sandwich Bay SPA Mitigation Strategy. Unpublished

²⁴⁴ APEM Ltd (2021). Stodmarsh Water Quality Modelling Dover District County Council. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/P6031-River-Stour-Connectivity-Study-Nov2021.pdf>)

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

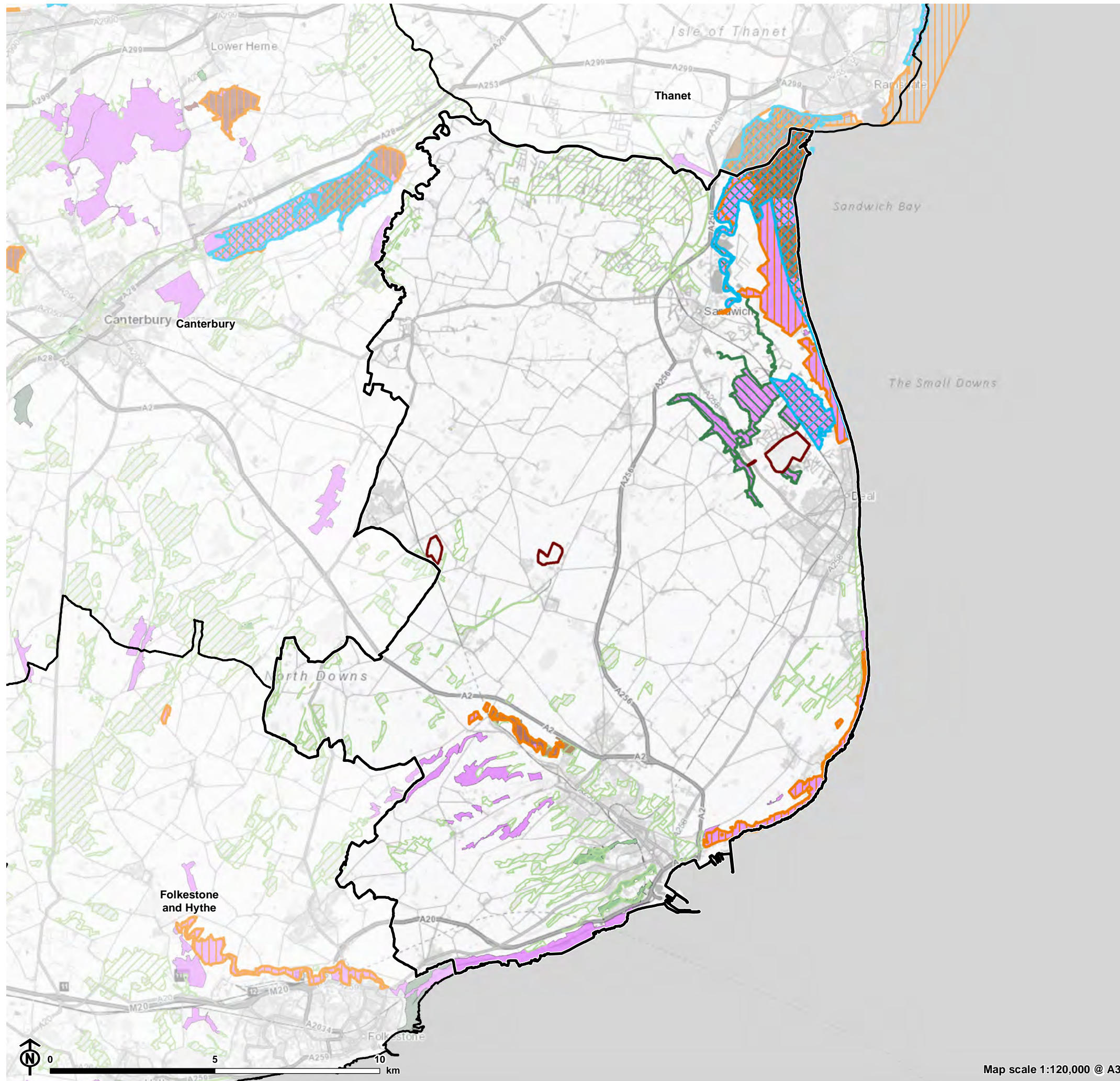
B.291 The District contains a significant number of BAP Priority Habitats. Pockets of deciduous woodland are scattered throughout the District, in discreet pockets and along field boundaries. The District contains less extensive distributions of good quality, semi-improved grasslands, which are largely concentrated in the southern quarter of the District. Coastal sand dunes, lowland fens and coastal and floodplain grazing marshes are located along Sandwich Bay and within Worth. Ancient woodland can be found on the chalk around Alkham, Swingfield and Lydden (near Dover), which have been designated as SSSIs for wildlife such as lady orchid, green hellebore and the dormouse. Figure B8 illustrates the biodiversity and geodiversity designations across the District.

Geodiversity

B.292 Three Regionally Important Geological Sites are located in the District:

- **Betteshanger Colliery Tip:** This RIGS is at the former Betteshanger Colliery, which was one of the largest collieries in Kent. The colliery opened in 1924-30 and closed in 1989. The tip, located to the north east of the former pit, was composed of carboniferous sedimentary rock. The fossil plant assemblages found indicate areas of forest, river levees and overbank (crevasse) deposition. A rare, large millipede-like arthropod fossil was also found. The tip has now been landscaped to create Fowlmead Country Park, now known as the Betteshanger Sustainable Parks.
- **Tilmanstone Colliery Tip:** The spoil tip of a colliery that opened in 1906-1913. The tip is composed of carboniferous sedimentary rock. The recording of the rocks and fossils in the spoil heap, now an endangered system in Kent, is important in our understanding of changes in climate and habitat. Fossil plants found at the colliery include clubmosses, horsetails, ferns and gymnosperms.
- **Snowdown Colliery Tip:** The spoil tip of a colliery that opened in 1909 and closed in 1987. The tip is composed of carboniferous sedimentary rock. A central depression was caused by extraction for construction of the Channel Tunnel. Fossil plants found at the site include arboreal clubmosses, horsetails, ferns, rare cordaites and charcoal. Fossil animals found include arthropods both terrestrial and freshwater.

Figure B.8: Biodiversity and Geodiversity Designations



- District boundary
- Neighbouring district boundary
- Special Protection Area
- Special Area of Conservation
- Ramsar
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site
- Regionally Important Geological Site

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.293 Key sustainability issues facing Dover District are as follows:

- Dover contains a number of designated biodiversity sites. All of these biodiversity assets, most notably the Thanet Coast & Sandwich Bay SPA and Ramsar Site, could be harmed by inappropriate development. The Local Plan provides an opportunity to evaluate the condition of the District's habitats and employ measures to ensure that future growth in the District does not adversely affect their current condition but where possible contributes to their improvement and connection (see SA objective 9).
- Green networks for wildlife and natural green spaces need to be set out clearly in the District Local Plan and any associated GI Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate (see SA objective 9).

SA objectives

Table B.7: Biodiversity SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	<p>SA9.1: Does the Plan avoid and mitigate adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?</p> <p>SA9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</p> <p>SA9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?</p> <p>SA9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?</p>	<p>Biodiversity</p> <p>Flora and Fauna</p> <p>Landscape</p>

Historic environment

Policy context

International

B.294 United Nations (UNESCO) World Heritage Convention (1972): promotes cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.295 European Convention for the Protection of the Architectural Heritage of Europe (1985): defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.296 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)²⁴⁵: aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

B.297 National Planning Policy Framework (NPPF) (2021)²⁴⁶: plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a. the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c. the desirability of new development making a positive contribution to local character and distinctiveness; and
- d. opportunities to draw on the contribution made by the historic environment to the character of a place."

B.298 National Planning Practice Guidance (NPPG) (2021)²⁴⁷: supports the NPPF by requiring that Local plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.

B.299 Ancient Monuments & Archaeological Areas Act 1979²⁴⁸: a law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

B.300 Planning (Listed Buildings & Conservation Areas) Act 1990²⁴⁹: an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

²⁴⁵ Council of Europe (1992). Valletta Treaty. (see <https://rm.coe.int/168007bd25>)

²⁴⁶ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

²⁴⁷ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

²⁴⁸ HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>)

²⁴⁹ HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf)

B.301 Historic Buildings and Ancient Monuments Act 1953²⁵⁰: an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

B.302 The Government's Statement on the Historic Environment for England (2010)²⁵¹: sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.303 The Heritage Statement (2017)²⁵²: sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.304 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016)²⁵³: sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

B.305 The Environment Act 2021²⁵⁴ sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of "*archaeological, architectural artistic, cultural or historic interest*".

Sub-national

B.306 The Kent Design Guide (2008)²⁵⁵: seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others achieve high standards of design and construction by promoting a common approach to the main principles which underlie Local Planning Authorities' criteria for assessing planning applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations. The guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

B.307 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)²⁵⁶: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030, development that is needed to support economic and community progress will be designed to best reflect the character, function and scale of its surroundings. The location of significant new developments will be considered across existing local authority boundaries, to ensure that local distinctiveness is properly reflected and needless environmental cost avoided.

B.308 The Kent Environment Strategy (2016)²⁵⁷: seeks to provide support to decision makers in ensuring that the county of Kent remains the highly desirable location of choice for visitors, residents and businesses. Delivery of the strategy will support a competitive and resilient economy, with business innovation in low carbon and environmental services driving economic growth.

²⁵⁰ HM Government (1953). Historic Buildings and Ancient Monuments Act 1953. (see <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>)

²⁵¹ HM Government (2010). The Government's Statement on the Historic Environment for England 2010. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>)

²⁵² Department for Digital, Culture Media and Sport (2017). Heritage Statement 2017. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf)

²⁵³ Historic England (2016). Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8. (see <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>)

²⁵⁴ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

²⁵⁵ Kent Design Initiative (2008). The Kent Design Guide. (see https://www.kent.gov.uk/_data/assets/pdf_file/0014/12092/design-guide-foreword.pdf)

²⁵⁶ East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

²⁵⁷ Kent County Council (2016). Kent Environment Strategy. (see https://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

Residents will have a high quality of life, saving money in warmer, healthier homes and benefitting from the many services provided through natural and historic assets both within their communities and across the county.

Local

B.309 Dover District Heritage Strategy (2013)²⁵⁸: seeks to ensure that the heritage of the Dover District plays a clear role in shaping any future regeneration, development and management decisions. It is intended that the Strategy provides a strategic and clear approach to dealing with Dover's heritage and that the document might act as a pilot exemplar for similar schemes elsewhere in the country. The Strategy identifies the following issues that the District's heritage assets are vulnerable to:

B.310 Natural processes such as coastal erosion, sea level change, change in hydrology and climate change;

- Rural activities such as ploughing and use of machinery, changes in farming regime and leisure use of the countryside;
- The development and maintenance of infrastructure such as utilities, power generation, roads and railways;
- Development of sites including house building, commercial and industrial properties, extraction of minerals, change in landuse, flood and coastal defence works;
- Change through alteration or economic decline and neglect;
- Policy shortcomings, designation thresholds and capacity for monitoring and enforcement;
- Criminal actions such as arson, theft, vandalism and anti-social behaviour.
- To take the strategy forward four broad objectives have been identified:
- Dover District's historic environment and its heritage assets play a proactive role in enabling and informing regeneration activities to secure better outcomes from sustainable growth.
- Dover District realises the tourism and visitor potential and economic benefits of its historic environment and heritage assets.
- Dover District's heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance.
- Public understanding of, engagement with, access to and enjoyment of Dover District's historic environment are increased.

Current baseline

B.311 The District's heritage assets play an important role in defining the character of the District and the identity of its settlements. In many cases they reflect the District's strategic coastal location and particularly in Dover's case, its military importance as the closest crossing point to continental Europe. This has given rise to a series of fortifications, most notably the Roman Classis Britannica, Dover Castle, Fort Burgoyne, the Western Heights and First and Second World War fortifications. Although Dover Castle is the District's top attraction, collectively these assets are not used in a way that exploits their full potential.

B.312 The Dover District has a rich heritage with 1,926 Listed Buildings (including 38 Grade I and 110 Grade II*), 50 Scheduled Monuments, 57 Conservation Areas and six Registered Parks and Gardens. One protected Wreck Site is located off the coast of Dover District. Two Heritage Coasts in Kent are found either side of the town of Dover. In addition, there are 21 locally-listed historic parks and gardens.

B.313 There are 10,650 non-designated heritage assets, including 772 standing buildings, 9845 below-ground archaeology features and findspots and 33 maritime features (principally shipwrecks). Some of these are of similar significance to the designated assets, produce most of the District's historic character and include many of the assets most valued by local

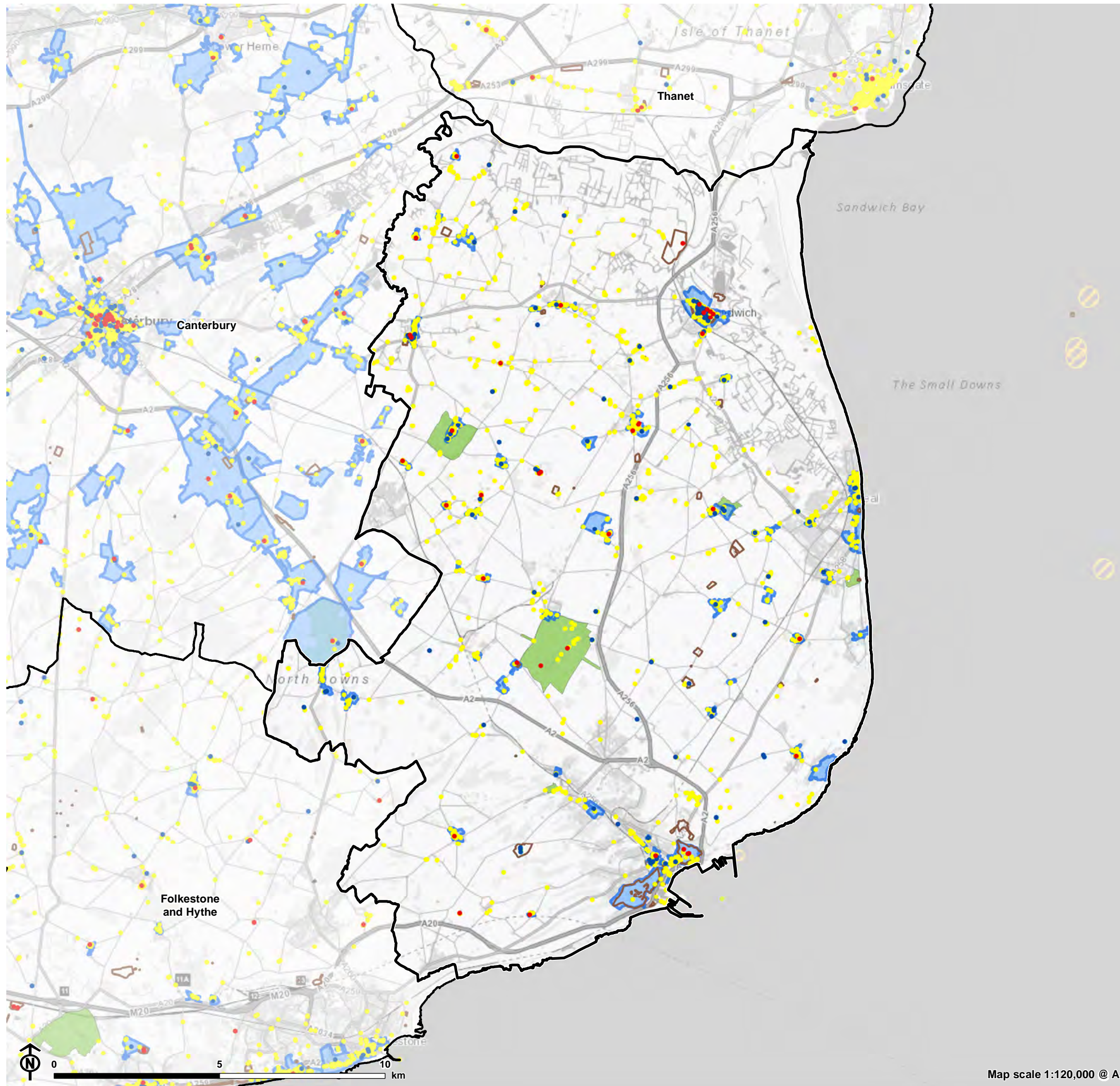
²⁵⁸ Dover District Council (2013). Dover District Heritage Strategy. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Heritage-Strategy-Main-Document.pdf>)

people²⁵⁹. Further information on the non-designated (and designated) heritage assets in Dover can be found on Kent County Council's Historic Environment Record.

B.314 The Historic England at Risk Register lists 13 assets at risk, five of which are in 'Very bad' condition (London Road, Mongeham Road, Western Heights, St Radegunds Abbey and The Belvedere in Waldershare Park) and three of which display 'Extensive significant problems' (ring ditch and enclosure 200yds east of Parsonage Farm, Great Mongeham Anglo-Saxon cemetery and four ring ditches on ridge of Sutton Hill). The Church of St Martin in Great Mongha, St Mary in Wingham and the ruins of St James' Church in Dover are in poor condition. Fort Burgoyne is also on the register, but is in fair condition. Figure B9 illustrates the designated heritage assets across the District.

²⁵⁹ Dover District Council (2020). Dover District Heritage Strategy 2020. (see <https://www.dover.gov.uk/Planning/Regeneration/PDF/Heritage-Strategy-main-doc-web-PDF.pdf>)

Figure B.9: Historic Environment



- District boundary
- Neighbouring district boundary
- World Heritage Site
- Scheduled monument
- Conservation area
- Registered Park and Garden
- Protected wreck
- Listed building**
 - Grade I
 - Grade II*
 - Grade II

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.315 Key sustainability issues facing Dover are as follows:

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

SA objectives

Table B.8: Historic environment SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	<p>SA10.1: Does the Plan avoid adverse effects on the District's designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly at risk assets?</p> <p>SA10.3: Does the Plan promote access to as well as enjoyment and understanding of the local historic environment for the District's residents and visitors?</p>	Cultural Heritage

Landscape

Policy context

International

B.316 European Landscape Convention (2002)²⁶⁰: promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

B.317 National Planning Policy Framework (NPPF) (2021)²⁶¹: planning principles include:

- Recognising the intrinsic beauty and character of the countryside.
- Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
- Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.

B.318 National Planning Practice Guidance (PPG) (2021)²⁶²: updated in 2019 to provide information on how development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty should be dealt with. According to the guidance, land within the setting of these areas often makes an important contribution to maintaining their natural beauty. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

B.319 A Green Future: Our 25 Year Plan to Improve the Environment (2018)²⁶³: sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

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

B.320 National Parks and Access to the Countryside Act 1949 (1949)²⁶⁴: an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

B.321 Countryside and Rights of Way Act 2010²⁶⁵: an Act of Parliament to make new provision for public access to the countryside.

²⁶⁰ Council of Europe Landscape Convention (2000). The European Landscape Convention. (see <https://www.coe.int/en/web/landscape/the-european-landscape-convention>)

²⁶¹ Department for Levelling Up, Housing and Communities (last updated July 2021). National Planning Policy Framework. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

²⁶² Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (last updated 24 June 2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

²⁶³ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

²⁶⁴ HM Government (1949). National Parks and Access to the Countryside Act 1949. (see <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>)

²⁶⁵ HM Government (2010). Countryside and Rights of Way Act 2010. (see <https://www.legislation.gov.uk/ukpga/2000/37/section/85>)

B.322 England National Parks and the Broads: UK Government Vision and Circular (2010)²⁶⁶: provides updated policy guidance on the English National Parks and Broads. It also sets out a vision for 2030 and the key outcomes the Government is seeking over the next five years to ensure early progress towards the vision.

B.323 The key area in the **25 Year Environment Plan (2018)²⁶⁷** of relevance in terms of the conservation and enhancement of landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

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

B.324 National Design Guide (2021)²⁶⁸: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.325 National Model Design Code (2021)²⁶⁹: provides detailed guidance on the production of design codes, guides and policies for local authorities and communities, to promote successful design that is good quality. The National Model Design Code forms part of the government's Planning Practice Guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

B.326 The Environment Act 2021²⁷⁰ sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its 'archaeological, architectural, artistic, cultural or historic interest.'

Sub-national

B.327 Kent Downs Area of Outstanding Natural Beauty: Management Plan 2021-2026 (2014)²⁷¹: sets out the shared vision of the future of the AONB. The Plan identifies key issues, opportunities and threats facing the landscape and sets out aims and principles for the positive conservation and enhancement of the Kent Downs for a five-year period. The goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened well into the future.

B.328 Lighting the way to success: The EKLSP Sustainable Community Strategy (2009)²⁷²: the document sets out the clear, long-term vision for East Kent, covering the Districts of Canterbury, Dover, Folkestone and Hythe and Thanet. The vision is that "By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities". By 2030, East Kent's many designated areas of particular landscape interest will be managed more collaboratively, stressing their interdependence and strengthening their capacity to withstand development pressures.

²⁶⁶ Department for Environment, Food and Rural Affairs (2010). English National Parks and the Broads: UK Government Vision and Circular 2010. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

²⁶⁷ Defra (2021). A Green Future: Our 25 Year Plan to Improve the Environment. (see <https://www.gov.uk/government/publications/25-year-environment-plan>)

²⁶⁸ Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

²⁶⁹ Ministry of Housing, Communities and Local Government (2021). National Model Design Code. (see <https://www.gov.uk/government/publications/national-model-design-code>)

²⁷⁰ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

²⁷¹ Kent Downs AONB Unit (2014). Kent Downs Area of Outstanding Natural Beauty: Management Plan 2014-2019. (see http://www.kentdowns.org.uk/uploads/documents/1_The_Kent_Downs_AONB.pdf)

²⁷² East Kent Local Strategic Partnership (2009). Lighting the way to success: The EKLSP Sustainable Community Strategy. (see [https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting the Way to Success The EKLSP Sustainable Community Strategy \(Document Ref A85\).pdf](https://www.shepway.gov.uk/media/2898/Lighting-the-Way-to-Success-The-EKLSP-Sustainable-Community-Strategy-Documents-Ref-A85/pdf/Lighting%20the%20Way%20to%20Success%20The%20EKLSP%20Sustainable%20Community%20Strategy%20(Document%20Ref%20A85).pdf))

Current baseline

Geology and soils

B.329 Dover District extends from the flat alluvial coastal marshes in the north and north east rising gradually across a band of mixed geology and fertile loamy soils to the undulating chalk landscapes and lime-rich soils that characterise much of the District. The valleys and ridges become more pronounced further south before rising sharply to the shallow soils of the rolling chalk downs in the south of the District, mostly within the Kent Downs AONB.

Landform and drainage

B.330 The landform of Dover District rises gradually from north to south and is drained by two main rivers, the River Stour in the north and the River Dour in the south.

B.331 The flat open landform on the northern periphery of the District is associated with the alluvial marshes of the Ash Levels, the Lower Stour Valley and Hacklinge Marshes of the Lydden Valley. The marshland and wetlands of this part of the North Kent Plain have an intricate pattern of drainage ditches and dykes which drain into the River Stour.

B.332 The low-lying shingle beaches along the coast are backed by sand dunes but rise to chalk cliffs to the south of Deal.

B.333 West of Sandwich the landform is characterised by the flat to gently undulating landscapes of the fertile horticultural belt.

B.334 As chalk begins to dominate the bedrock in the centre and south of the District, the topography is characterised by a regular pattern of rolling ridges and valleys running in a north west direction, which gets more defined towards to the south.

B.335 To the south of the District, along the boundary with the Kent Downs AONB, the landform rises sharply along the edge of the escarpment slope of the North Downs, at Lydden Hills and Guston Hills. The dry chalk valleys in this area are drained by the River Dour which runs to the coast through Dover. The town grew up around the river and it was a source of power or water throughout its history.

Agricultural land use

B.336 Land use within the District reflects the topography and soil types.

B.337 To the north of the District, the poor soils of the flat reclaimed land is used for pasture. These former marshlands are characterised by a network of drainage ditches marked by reeds.

B.338 The coastal land to the east of the District, although rich in biodiversity, is of little value for agriculture.

B.339 The deep well-drained loamy soils west of Sandwich supports a belt of intensive horticultural production, with orchards, potatoes and field vegetables, viticulture, and some cereals. This agricultural land is generally classified as Grade 1 – the most valuable agricultural land.

B.340 To the centre and south of the District the chalk bedrock supports an extensive cereal belt that thrives on the deep calcareous soils. Crops include wheat, oil seed rape, linseed oil and barley. This agricultural land is generally classified as Grade 1 and 2. Smaller, more enclosed fields around settlements or farmsteads are used for pasture.

B.341 Parkland and woodland diversify the mostly arable land use to the south of the District, where the more undulating landform has a mix of Grade 2 and 3 agricultural land.

B.342 On the steeper slopes of the chalk hills to the south, small pockets of species-rich unimproved grassland comprising areas of downland pasture, are interspersed with areas of scrub and native woodland.

Landscape designations

B.343 The Kent AONB extends across the south of the District and lies outside the scope of this study, although this study considered the interrelationships of landscape with the AONB including role as landscape setting.

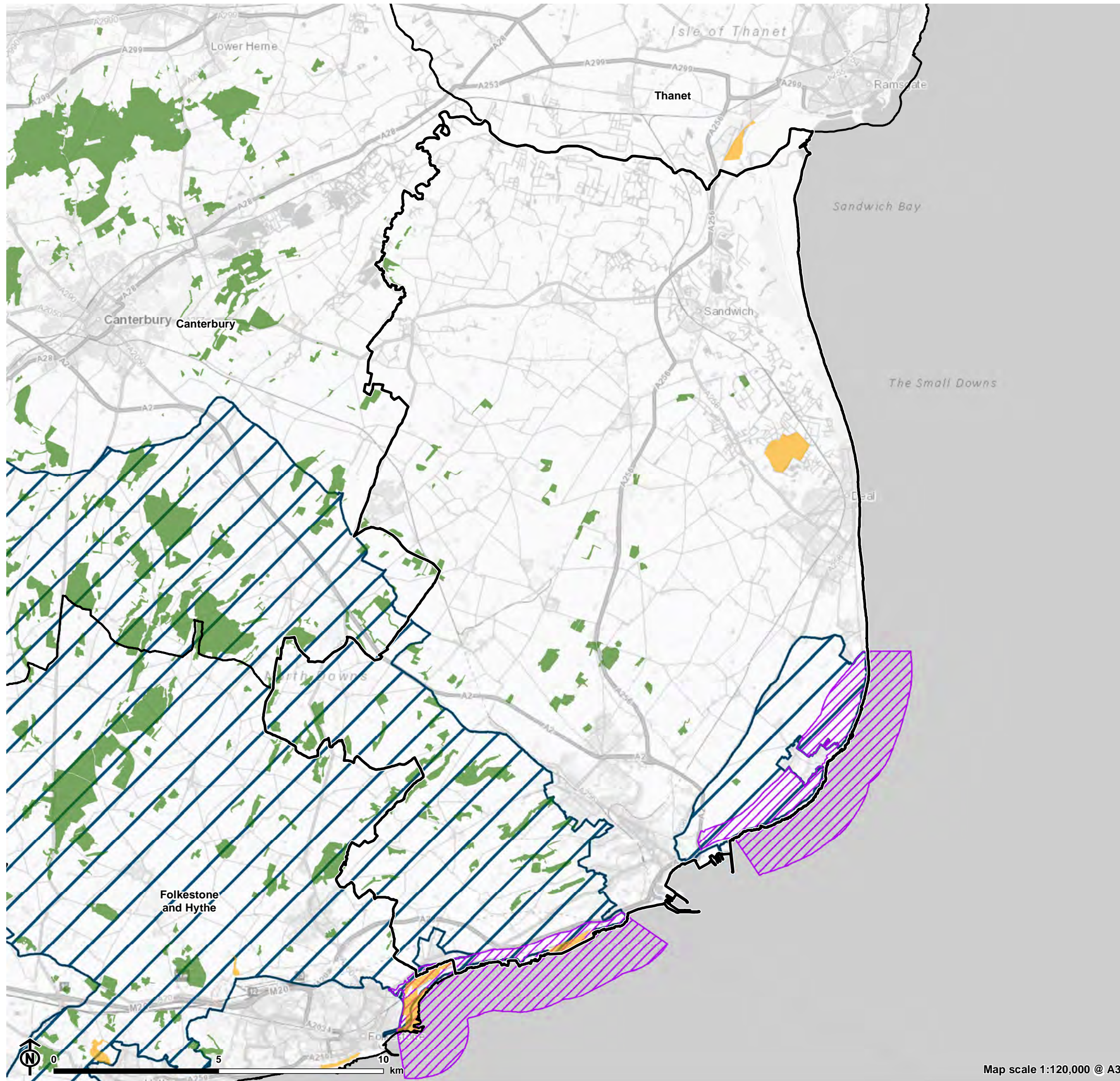
Landscape character types and areas

B.344 The District is comprised of the following landscape character types and areas²⁷³:

- River Valleys and Marshes:
 - Little Stour Marshes.
 - Ash Levels.
 - Little Stour and Wingham River.
- Developed River Valley:
 - Great Stour – Sandwich Corridor
- Coastal Marshes and Dunes:
 - Sandwich Bay
 - Lydden Valley
- Horticultural Belt:
 - Preston
 - Ash
 - Staple Farmlands
- Open Arable Chalk Farmland with Parkland:
 - Shepherdswell Aylesham Parklands
 - Whitfield Parkland
- Open Arable Chalk Farmland with Woodland:
 - Chillenden
 - Northbourne
 - Ripple
- Chalk Hills:
 - Lydden Hills
 - Guston Hills
- Defensive Hills:
- Richborough Bluff

²⁷³ LUC (2020). Dover District Landscape Character Assessment. (see <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Evidence-Base/Heritage.aspx>)

Figure B.10: Landscape Designations



- District boundary
- Neighbouring district boundary
- Area of Outstanding Natural Beauty
- Country park
- Ancient woodland
- Heritage coast

Map scale 1:120,000 @ A3

Sustainability issues and likely evolution without the Local Plan

B.345 Key sustainability issues facing Dover are as follows:

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

SA objectives

Table B.9: Landscape SA objectives and appraisal questions

SA Objectives	Supporting Appraisal Questions	Relevant SEA Topics
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	SA11.1: Does the Plan protect the District's sensitive and special landscapes, seascapes and townscapes? SA11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside, coastline and settlements?	Landscape Cultural Heritage Biodiversity Flora and Fauna