



**Dover District Council**

**Sustainability Appraisal  
Adoption Statement  
Adopted Local Plan**

Prepared by LUC  
September 2024



**Dover District Council**

**Sustainability Appraisal Adoption Statement**  
**Adopted Local Plan**

**Project Number**  
 10043

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# Chapter 1

## Introduction

**1.1** Dover District Council (hereafter ‘the council’) adopted the Dover District Local Plan in October 2024.

**1.2** Dover District Council was required by law to carry out Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Local Plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA) – the method and findings of which were described in a number of SA reports which were published alongside the different versions of the Dover District Local Plan during its development.

**1.3** Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the council to make the final SA report available alongside the adopted Local Plan.

**1.4** The most up-to-date, full SA report is the [Sustainability Appraisal Report](#) that accompanied the Submission Dover District Local Plan for a round of Regulation 19 consultation in October to December 2022 (hereafter referred to as the September 2022 SA Report). The September 2022 SA Report includes [Errata Sheet I](#) (September 2022)<sup>1</sup>. The Regulation 19 Submission Dover District Local Plan (October 2022), September 2022 SA Report, supporting evidence and consultation responses were submitted for Examination on 31 March 2023.

**1.5** Following submission of these documents, an [SA Addendum](#) was produced in March 2023 (hereafter referred to as the March 2023 SA Addendum) to reflect the revised findings of the HRA (see **How opinions of consultation bodies and the public have been taken into account**), and included [Errata Sheet II](#). The SA Addendum was consulted upon in May to July 2023 at the same time as the [Non-Technical Summary](#) of the September 2022 SA Report.

**1.6** Dover District Council prepared a Schedule of Main Modifications (April 2024) following the Examination hearing sessions, which took place in November to December 2023. The proposed Main Modifications to the submitted Regulation 19 Submission Dover District Local Plan were published for consultation between April and May 2024.

**1.7** An [Addendum](#) to the September 2022 SA Report and March 2023 SA Addendum was prepared and published alongside the Main Modifications for consultation, which described the likely sustainability effects of the Main Modifications (hereafter referred to as the April 2024 Main Modifications SA Addendum).

**1.8** The April 2024 Main Modifications SA Addendum concluded that although the SA identifies changes to the sustainability effects of a small number of policies and site allocations, these changes would not alter the overall cumulative effects of the Regulation 19 Submission Dover District Local Plan in relation to each SA objective, as recorded in Chapter 7 of the September 2022 SA Report and subsequent addendum reports and erratum. Dover District Council also published a [Schedule of Policies Map Modifications](#) (April 2024) and [Schedule of Additional Modifications](#) (April 2024).

**1.9** The final SA Report for the adopted Local Plan is therefore the September 2022 SA Report together with the March 2023 SA Addendum, as amended by the April 2024 Main Modifications Addendum.

**1.10** In the Inspectors’ Final Report published in September 2024, the Inspectors confirmed that the SA was adequate with reasonable alternatives having been considered to a sufficient degree.

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<sup>1</sup> Errata Sheet I provides updates to the SA regarding the location of GP surgeries.

## Requirement for the Adoption Statement

**1.11** In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012) for the final SA report to be published alongside the adopted plan, the SEA Regulations<sup>2</sup> also require a number of steps to be taken upon adoption of a plan (in this case the Local Plan). Specifically, SEA Regulation 16 sets out the post-adoption procedures and requirements for SEA. The planning authority must, as soon as is reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and a statement explaining the following:

- How environmental (and sustainability) considerations have been integrated into the plan.
- How the Environmental Report (i.e. Sustainability Appraisal) has been taken into account during the preparation of the plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the plan as adopted, in light of the other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

**1.12** The council must also inform the public, Historic England, Natural England and the Environment Agency about the availability of these documents.

**1.13** As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Dover District Local Plan. The remainder of the document is structured according to the SEA Regulations' requirements listed above, as follows:

- **How environmental and sustainability considerations have been integrated into the adopted Local Plan** summarises how environmental and sustainability considerations have been integrated into the Dover District Local Plan, including by explaining who carried out the SA and what assessment framework was used.
- **How the Environmental Report has been taken into account** summarises how the SA Report (referred to in the SEA Regulations as the 'Environmental Report') has been taken into account, considering the links between the plan-making and SA process.
- **How opinions of consultation bodies and the public have been taken into account** summarises the consultation opinions provided on the Environmental Report at each stage and describes how the results were taken into account.
- **Why the adopted Local Plan was chosen in light of reasonable alternatives** describes why the adopted Dover District Local Plan was chosen, in light of reasonable alternatives dealt with.
- **How the environmental and sustainability effects of the adopted Local Plan will be monitored** describes how the significant environmental effects of the implementation of the Dover District Local Plan will be monitored.

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<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)

## Chapter 2

### How environmental and sustainability considerations have been integrated into the adopted Local Plan

**2.1** The SA (incorporating SEA) of the Dover District Local Plan began in July 2017, starting with the Sustainability Appraisal Scoping Report for the emerging Dover District Local Plan. LUC produced the SA Scoping Report, which was published in February 2018 for a five week consultation period with statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate.

**2.2** The purpose of the SA Scoping Report was to assist Dover District Council in preparing the Local Plan by identifying the key sustainability issues that face the district, to predict what the likely effects of the Local Plan on these issues would be, and to put forward recommendations to mitigate and monitor the effects identified. The aim was to help ensure that the Dover District Local Plan has as many positive effects as possible and that any negative effects were avoided or mitigated as far as reasonably possible.

**2.3** The SA was undertaken iteratively, such that at each stage of the preparation of the Dover District Local Plan, the sustainability and environmental effects of the options for the Plan were assessed. The SA assessed a range of options for the Dover District Local Plan, and the council considered the SA findings to inform which options to take forward and what mitigation may need to be incorporated into the Dover District Local Plan to address any adverse effects identified by the SA. Information on the options considered in the plan-making process and assessed through the SA process is set out in Chapter 2 of the September 2022 SA Report. In this way, environmental and sustainability considerations were integrated into the Dover District Local Plan as it was developed. **How the Environmental Report has been taken into account** of this Adoption Statement expands on how the findings of the SA process were taken into account through the plan-making process.

**2.4** The way in which the environmental and sustainability effects of the Dover District Local Plan were consistently described, analysed and compared was through the use of a set of SA objectives referred to as the 'SA framework'. The SA framework used to appraise the Dover District Local Plan was developed during the Scoping stage of the SA process in 2018 and was consulted upon as part of the SA Scoping Report in February to March 2018. The SA objectives were identified at the Scoping stage, taking into account the information collated in the review of plans and programmes, baseline analysis and identification of sustainability issues.

**2.5** The SA framework is presented below (**Table 2.1**) and was used to test options considered for the Dover District Local Plan. The SA framework was accompanied by a series of assumptions referred to as the site assessment criteria (Appendix C in the September 2022 SA Report), setting out how geographically-specific options would be assessed against the framework. The 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

### Habitats Regulations Assessment

**2.6** The Dover District Local Plan was also subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>3</sup>, and previous versions of these Regulations as applicable at the time of preparing each stage of the HRA. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of European designated sites for nature

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<sup>3</sup> The Conservation of Habitats and Species Regulations 2017

conservation and to ascertain whether it would adversely affect the integrity of those sites. Although the HRA process for the Dover District Local Plan was undertaken and reported on separately from the SA, it informed the findings of the SA under SA objective 9 (biodiversity).

**2.7** The [HRA Report](#) that was submitted alongside the Dover District Local Plan was also prepared by LUC in September 2022 and updated in March 2023, in light of comments received during the Regulation 19 consultation, in relation to the Regulation 19 Submission Dover District Local Plan (October 2022). It concludes that no Adverse Effect on Integrity will occur for the following European sites, subject to the provision of safeguarding and mitigation measures as detailed in Chapter 5 'Appropriate Assessment' of the HRA.

- Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar;
- Stodmarsh SPA and Ramsar;
- Sandwich Bay Special Area of Conservation (SAC);
- Thanet Coast SAC;
- Blean Complex SAC;
- Margate and Long Sands SAC;
- Outer Thames Estuary SPA;
- Lydden and Temple Ewell Downs SAC;
- Dover to Kingsdown Cliffs SAC; and
- Folkestone to Etchinghill Escarpment SAC.

**2.8** The [HRA Report](#) was updated again in April 2024 to consider the implications of the proposed Main Modifications to the Regulation 19 Submission Dover District Local Plan for the HRA findings reported previously (hereafter referred to as the April 2024 HRA Report). It also concluded that no Adverse Effect on Integrity will occur for the European sites, subject to the provision of safeguarding and mitigation measures detailed in the HRA Report.

**2.9** The Inspectors' Report concludes that subject to the identified mitigation measures, which the Plan provides for, the policies and allocations in the Plan will not have a significant adverse impact on the integrity of relevant European sites.

Table 2.1 SA framework used to appraise the adopted Local Plan and its reasonable alternatives

SA Objective	Appraisal Questions: Will the Plan/option lead to...?
SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	<p>SA 1.1: Does the Plan deliver the range of types, tenures and affordable homes the district needs over the Plan Period?</p> <p>SA 1.2: Does the Plan allocate small, medium to large scale sites to deliver homes in the short, medium and long term?</p> <p>SA 1.3: Do the Plan's allocations safeguard and enhance the identity of the district's existing communities and settlements?</p>
SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration.	SA 2.1: Does the Plan promote equality of access and opportunity through adequate provision and distribution of local community, health, education and retail services and facilities for all?
SA 3: To deliver and maintain sustainable and diverse employment opportunities.	<p>SA 3.1: Does the district have an adequate supply of land and infrastructure to meet the district's forecast employment needs with sufficient flexibility to respond to uncertainties following Brexit?</p> <p>SA 3.2: Does the Plan deliver the spatial strategic priorities of the East Kent Local Investment Plan 2011-2026, relating to Dover Port, Waterfront and Town Centre, the A2 corridor, and the Whitfield extension?</p> <p>SA 3.3: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?</p> <p>SA 3.4: Does the Plan maintain and enhance the economic vitality and vibrancy of the district's town centres and tourist attractions?</p> <p>SA 3.5: Does the Plan support the prosperity and diversification of the district's rural economy?</p> <p>SA 3.6: Does the district have sufficient education facilities to help provide the working population with the skills the district's existing and future employers need?</p>
SA 4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	<p>SA 4.1: Does the Plan promote the delivery of integrated, compact communities made-up of a complimentary mix of land uses?</p> <p>SA 4.2: Does the Plan support the maintenance and expansion of sustainable public and active transport networks?</p> <p>SA 4.3: Does the Plan facilitate working from home and remote working?</p>



SA Objective	Appraisal Questions: Will the Plan/option lead to...?
	SA4.4: Does the Plan help to address road congestion, particularly congestion in locations also suffering from congestion related to Port activity?
SA 5: To promote sustainable forms of development that maintain and improve the quality of the district's natural resources, including minerals, soils and waters.	<p>SA 5.1: Does the Plan prioritise the remediation and development of poorer quality brownfield land over greenfield land?</p> <p>SA 5.2: Does the Plan prioritise development of poorer quality agricultural land of the district's best and most versatile agricultural land?</p> <p>SA 5.3: Does the Plan minimise development in mineral safeguarding areas?</p> <p>SA 5.4: Does the Plan direct inappropriate development away from source protection zones?</p> <p>SA 5.5: Does the Plan minimise water use?</p> <p>SA 5.6: 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>SA 5.7: Does the Plan encourage the reuse and sourcing of local materials?</p> <p>SA 5.8: Does the Plan encourage a reduction in waste production and the movement of waste management practices up the waste hierarchy?</p>
SA 6: To reduce air pollution and ensure air quality continues to improve.	SA 6.1: Does the plan avoid, minimise and mitigate the effects of poor air quality?
SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change.	<p>SA 7.1: 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?</p> <p>SA 7.2: Does the Plan promote climate change resilience through sustainable siting, design, landscaping and infrastructure?</p>
SA 8: To mitigate climate change by actively reducing greenhouse gas emissions.	<p>SA 8.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat?</p> <p>SA 8.2: Does the Plan promote and facilitate sustainable patterns of development, the use of electric cars, and sustainable modes of transport?</p>
SA 9: To conserve, connect and enhance the district's wildlife habitats and species.	SA 9.1: 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?

SA Objective	Appraisal Questions: Will the Plan/option lead to...?
	<p>SA 9.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</p> <p>SA 9.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?</p> <p>SA 9.4: Does the Plan promote climate change resilience through multifunctional green infrastructure networks for people and wildlife?</p>
<p>SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the district's historic environment.</p>	<p>SA 10.1: Does the Plan avoid adverse effects on the district's designated and undesignated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA 10.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the district's heritage assets, particularly at risk assets?</p> <p>SA 10.3: Does the Plan promote access to, as well as enjoyment and understanding of the local historic environment, for the district's residents and visitors?</p>
<p>SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the district's settlements, coastline and countryside.</p>	<p>SA 11.1: Does the Plan protect the district's sensitive and special landscapes, seascapes and townscapes?</p> <p>SA 11.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the district's countryside, coastline and settlements?</p>

## Chapter 3

### How the Environmental Report has been taken into account

**3.1** As explained above, the SA process for the Dover District Local Plan was undertaken iteratively with an SA Report and associated Addenda informing the Plan's development. As part of this process, an assessment of the likely sustainability and environmental effects of the Plan was made through the SA at each stage of its development.

**3.2** The SA assessed all sites, policies and proposals in each iteration of the Dover District Local Plan and their reasonable alternatives, including the proposed Main Modifications made to the Dover District Local Plan following its submission. This, alongside other material planning considerations, helped to inform the council's decision-making on which options to take forward.

**3.3** How the SA Reports (each of which met the requirements of an 'Environmental Report' under the SEA Regulations) informed each stage of the plan-making process is set out below.

#### Sustainability Appraisal Scoping Report (February 2018)

**3.4** The Scoping stage of the SA involved compiling baseline information about the environmental, social and economic issues in the Plan area, as well as the policy context (involving a review of plans, policies and programmes) and key sustainability issues. The SA framework was then developed, setting out the SA objectives against which Plan options were appraised. The SA Scoping Report was shared with the statutory consultees (Historic England, Natural England and the Environment Agency) for a five week period before its contents were refined in light of the consultation comments received in the first full SA Report documented below.

#### Regulation 18 stage: Draft Dover District Local Plan

##### Sustainability Appraisal Report (December 2020)

**3.5** The Draft Dover District Local Plan set out Dover District Council's overarching vision and associated strategic objectives for Dover District up to 2040, in addition to policies and proposed site allocations. The policies covered the following topics: climate change, new homes, employment and the local economy, retail and town centres, transport and infrastructure, design, the natural environment and the historic environment.

**3.6** The SA Report to accompany the Draft Dover District Local Plan at Regulation 18 consultation stage (hereafter referred to as the December 2020 SA Report) was produced at this stage. In addition to providing an appraisal of the vision, strategic objectives and policies within the Draft Local Plan, it also provided an appraisal of a range of reasonable growth and spatial options, and reasonable site options.

**3.7** The significant effects identified through the SA of the Draft Local Plan and its reasonable alternatives helped to guide the council, alongside wider material considerations and evidence, in identifying how best to address the issues facing the Plan area. This included a range of recommendations, such as revisions to policy wording to provide clarity and strengthen them, additional policy wording that named particular sensitivities in close proximity to sites and measures to avoid or mitigate adverse effects generated by development, requirements for developers to design in mitigation and enhancement measures, the selection of alternative site options, the incorporation of recommendations set out in the HRA and cross references to other policies in the Local Plan that provide mitigation, while ensuring these changes did not prohibit or undermine the viability of development.



## Regulation 19 stage: Submission Dover District Local Plan

### Sustainability Appraisal Report (September 2022)

**3.8** The Regulation 19 Submission Dover District Local Plan also set out Dover District Council's overarching vision and associated strategic objectives up to 2040. It contained strategic policies setting out how this would be delivered, and identified strategic and non-strategic housing and employment allocations. The Regulation 19 Submission Dover District Local Plan also set out how development would be managed through development management policies on: climate change, planning for healthy and inclusive communities, new homes, employment and the local economy, retail and town centres, transport and infrastructure, the natural environment and the historic environment. The Regulation 19 Submission Dover District Local Plan was subject to SA, as were reasonable alternative policy approaches considered by the council in drafting the proposed policies.

**3.9** The September 2022 SA Report built on the December 2020 SA Report that accompanied the Draft Dover District Local Plan consultation.

**3.10** The significant effects identified through the SA of the Publication Local Plan and its reasonable alternatives helped to guide the council, alongside wider material considerations and evidence to finalise the scope and detailed content of the Local Plan prior to its submission. The SA included a range of recommendations, such as additional policy wording that named particular sensitivities in close proximity to sites and identified measures to avoid or mitigate adverse effects generated by these site allocations, in addition to the incorporation of recommendations set out in the HRA. The number of recommendations made at this stage was limited as most recommendations had been addressed from the previous Regulation 18 stage.

**3.11** In general, the options and policy approaches that were taken forward in the Regulation 19 Submission Dover District Local Plan were those that performed more positively or at least as well against the SA objectives than the rejected options, although in some cases other planning considerations influenced which option should be taken forward.

**3.12** The 2022 SA Report includes Errata Sheet I, which provided updates to the SA regarding the location of GP surgeries.

### March 2023 Sustainability Appraisal Addendum

**3.13** During the Regulation 19 consultation, Dover District Council received a response from Natural England which included several comments on the contents and judgements made in the HRA Report. They advised that some of the judgements were too precautionary and could be revised. The HRA Report was consequently updated in March 2023. As the September 2022 SA Report drew on the findings of the HRA Report to determine the likely effects of the Dover District Local Plan on SA objective 9 (Biodiversity), an SA Addendum was produced to summarise the changes to the HRA Report findings and confirm whether these changes affected any of the conclusions made in the September 2022 SA Report.

**3.14** As outlined in the March 2023 SA Addendum, eleven site allocation policies recorded in the SA as having the potential for significant or minor negative effects on SA objective 9 were no longer considered likely to result in the physical damage or loss of land functionally linked to European sites, due to the fact they were no longer considered to support Golden Plover. Although this species depends on offsite arable fields and grasslands, this was no longer considered to be the case for European sites over 5km away.

**3.15** The March 2023 SA Addendum includes Errata Sheet II. This Sheet presents an appraisal of a corrected site boundary for Site Allocation Policy SAP3, which resulted in no changes to the effects recorded in the original appraisal of site.

### Submission to the Secretary of State

**3.16** The September 2022 SA Report and March 2023 SA Addendum were submitted to the Secretary of State alongside the Regulation 19 Submission Dover District Local Plan on 31 March 2023.

## Examination

**3.17** Examination hearings for the Regulation 19 Submission Dover District Local Plan took place in November to December 2023. Following the examination hearing sessions, an SA Addendum to the September 2022 SA Report and March 2023 SA Addendum was produced to support the Local Plan Examination and assess the proposed Main Modifications to the Regulation 19 Submission Dover District Local Plan, the details of which are set out below.

### April 2024 Main Modifications Sustainability Appraisal Addendum

**3.18** The Main Modifications SA Addendum to the September 2022 SA Report and March 2023 SA Addendum was prepared to assess and describe the likely sustainability effects of the Main Modifications to the Regulation 19 Submission Dover District Local Plan. This was published alongside the Main Modifications for consultation from April to May 2024.

**3.19** The SA Addendum concluded that although the SA identified changes to the sustainability effects of a small number of policies, these changes would not alter the overall cumulative effects of the Regulation 19 Submission Dover District Local Plan in relation to each SA objective, as recorded in Chapter 7 of the September 2022 SA Report and subsequent Addenda. No reasonable alternatives to the Main Modifications and Policies Map Modifications were identified.

**3.20** Following consultation on the Main Modifications and SA Addendum, the Inspectors' Final Report concluded that, subject to the Inspectors recommended Main Modifications outlined in the Appendix to their report, the Dover District Local Plan satisfies the requirements of Section 20 (5)(a) of the Planning and Compulsory Purchase Act 2004 and is sound.

## Chapter 4

### How opinions of consultation bodies and the public have been taken into account

**4.1** At each stage of the development of the Dover District Local Plan, an SA Report has been published alongside the Local Plan document for consultation with the public and consultation bodies specifically referred to in the SEA Regulations (Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.

**4.2** The Dover District Local Plan consultation stages and responses received relating to the SA document are summarised below.

#### Sustainability Appraisal Scoping Report (February 2018)

**4.3** The SA Scoping Report was subject to consultation between February and March 2018, with the SEA statutory bodies (Historic England, the Environment Agency and Natural England).

**4.4** This provided an opportunity for consultees to comment on the proposed scope and level of detail of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Dover District Local Plan and whether the review of relevant plans, policies and programmes (the 'PPP' review) and baseline information were appropriate and complete.

**4.5** Comments received on the SA Scoping Report were taken into consideration and addressed in the next iteration of the SA, namely the December 2020 SA Report which accompanied the Draft Dover District Local Plan. A number of amendments were made to the PPP, baseline information, key sustainability issues, SA framework and site assessment criteria. Full details on how each response was addressed are set out in Appendix A of the September 2022 SA Report.

#### December 2020 Sustainability Appraisal Report

**4.6** The December 2020 SA Report accompanied the Draft Dover District Local for Regulation 18 consultation between January and March 2021. Comments made during the consultation were taken into consideration and informed the preparation of the Publication (Regulation 19) Dover District Local Plan and accompanying SA Report. Specifically, some additional wording was added to one of the appraisal questions in the SA framework, plus some additions to the baseline information and key sustainability issues.

**4.7** Consultation comments received in relation to the December 2020 SA Report are detailed in Appendix A of the September 2022 SA Report, along with a response to each. Any necessary changes were implemented in these iterations of the SA.

#### September 2022 Sustainability Appraisal Report

**4.8** The SA Report for the Regulation 19 Submission Dover District Local Plan, also referred to as the September 2022 SA Report, accompanied the Submission Dover District Local Plan for Regulation 19 consultation between October and December 2022. Many of the consultation responses received in relation to the SA Report focussed on specific sites that had been selected for allocation, including how they had been appraised in the SA. The consultation responses received did not require any changes to the SA.



### March 2023 Sustainability Appraisal Addendum

**4.9** The March 2023 SA Addendum and Non-Technical Summary of the September 2022 SA Report were published at a later date to the September 2022 SA Report, and consulted on between April and May 2023. The consultation responses received did not require any changes to the SA.

### April 2024 Main Modifications Sustainability Appraisal Addendum

**4.10** In April 2024, an SA Addendum was prepared and published for consultation alongside the Schedule of Main Modifications between April and May 2024. The proposed Main Modifications were subject to SA. The nature of the proposed Main Modifications and proposed Policies Map Modifications did not result in the identification of reasonable alternatives that required consideration through the SA.

**4.11** The responses received were sent to the Inspectors for consideration in preparing the Inspectors' Final Report.

## Chapter 5

# Why the adopted Local Plan was chosen in light of reasonable alternatives

**5.1** The council considered a range of reasonable alternative options during the preparation of the Dover District Local Plan, specifically alternative growth options, spatial options, site options and policy options.

**5.2** Information considered by the council before final decisions were made included:

- The SA findings, particularly the significant effects generated by each option.
- Dover District Local Plan's vision and objectives.
- Results of consultation and engagement with the general public and key stakeholders.
- The evidence base for the Dover District Local Plan.

**5.3** The options considered for the Dover District Local Plan are described below alongside a summary of the council's reasons why the preferred options were selected over the reasonable alternatives.

**5.4** In each iteration of the SA, there are numerous sub-headings entitled 'Council's reasons for selecting the preferred option' under which detailed reasoning is provided on each of the council's preferred options.

### Growth and spatial options

**5.5** A Local Plan must determine both the strategic scale and distribution of growth. It was therefore necessary for the SA to appraise all potential combinations of the reasonable scales and distributions of growth. 15 combined growth/spatial reasonable options were identified and appraised.

**5.6** The SA concluded that Spatial Options C (Settlement Hierarchy) and D (Adopted Plan Dover Focus) generally performed the most strongly against the SA objectives, particularly when delivering the lowest or medium growth scenarios.

**5.7** Dover District Council's preferred option represents a hybrid of Spatial Options A (Suitable Sites), C (Settlement Hierarchy) and D (Adopted Plan Dover Focus), delivering a scale of residential and employment growth closest to Growth Option 2 (Medium Growth). This decision was made in light of the SA findings, the availability and suitability of site options, the wider Local Plan evidence base and the views of stakeholders and the public.

### Vision and objectives

**5.8** The Dover District Local Plan identifies 17 strategic objectives covering: climate change mitigation and adaptation; flood risk; designated and undesignated heritage assets; biodiversity and green infrastructure; natural landscapes and water environments; environmental protection; economic growth; strengthening the role town centres; tourism and the visitor economy; housing; sustainable locations; high-quality design; community infrastructure and assets; health and well-being; active travel; infrastructure delivery; and sustainable development.

**5.9** The vision and objectives are aspirational and were informed by the Local Plan evidence base, the Council Corporate Plan and several Local Plan workshops. No reasonable alternatives were identified by the council, but the vision and objectives have evolved slightly over time. The vision and objectives were originally appraised at the Regulation 18 Draft Dover District Local Plan stage and additions to the wording

were made following this. The appraisal was then revised at the Regulation 19 stage. The final version of the vision and objectives are contained within the adopted Dover District Local Plan.

## Policy options

**5.10** Dover District Council identified alternative policy options through initial consultation and workshops, the Local Plan evidence base, relevant legislation and planning guidance and readings of other Local Plans, including the district's own adopted Core Strategy and Land Allocations Local Plan. These options were presented in the Draft Dover District Local Plan, which asked consultees if they agreed with all the options identified and selected, and requested information on other reasonable alternatives that had not been considered to date. The results of the SA of the Draft Dover District Local Plan policies and their reasonable alternatives, including identified significant and uncertain effects and associated recommendations, were shared with the council and informed the preferred options identified at this stage. These effects and recommendations were published for consultation alongside the Draft Dover District Local Plan in the December 2020 SA Report. The results, among other factors, fed into the next stages of the Dover District Local Plan preparation.

**5.11** In preparing the Regulation 19 Submission Dover District Local Plan, reasonable alternatives continued to be considered by the council alongside the consultation comments received at Regulation 18 stage. All identified options were subject to SA and where multiple options existed, the council selected which option to take forward. These options were presented in the finalised Regulation 19 Submission Dover District Local Plan. LUC appraised the final draft policies and the results, including identified significant and uncertain effects and associated recommendations, which were considered by the council and fed into finalising the policies for the Regulation 19 Submission Dover District Local Plan.

**5.12** Common reasons for the selection of preferred policy options of identified reasonable alternatives included:

- The option being necessary to comply with national policy and guidance.
- The option making an important contribution towards council aspirations and targets.
- The option providing a good level of guidance for applicants and officers.
- The option being stringent in its approach to addressing a key issue experienced in the district.
- The option being consistent with the evidence base and topic papers.
- The option aligning with the council's preferred spatial strategy.
- The option reflecting other council strategies.

## Site options

### Residential site options

**5.13** Dover District Council's Housing and Employment Land Availability Assessment (HELAA) identified numerous residential site options. These residential site options were subject to an initial sift with some sites eliminated as unsuitable. The remaining sites were then subject to a more detailed site suitability assessment, which determined which sites were considered suitable or potentially suitable. Following this, the sites were subject to an availability assessment, which determined which sites were available for development within the Plan period. The HELAA process, using these assessments, concluded how many residential sites could be considered reasonable alternatives and subsequently subjected to SA.

**5.14** In order to ensure consistency in the appraisal of site options, detailed area-based assessment criteria and precautionary assumptions were developed and applied. These assumptions set out clear parameters within which certain effects were identified against each SA objective in the SA framework, and were applied through the use of Geographical Information Systems. These criteria are presented in Appendix C of the September 2022 SA Report. As set out in the final column of Table C.1 ('Residential site assessment criteria



and assumptions), a significance score was calculated for each SA objective using the criteria and assumptions.

**5.15** The appraisal of site options was undertaken on a 'policy-off' basis, i.e. detailed consideration was not given to measures that might help to avoid and mitigate adverse effects or enhance positive effects in any given location. This ensured all site options were appraised fairly, based on the same assumptions and to the same level of detail before the council's final site allocations were selected. Once the council had determined which sites to allocate, each was appraised on a 'policy-on' basis, i.e. through the policy in which it was allocated, taking into account the mitigation provided by each policy. Generally, the appraisal work attempted to differentiate between the most significant effects and other more minor effects. The effects were compared and helped inform final decisions regarding the Local Plan.

**5.16** During the consultation on the Regulation 18 Draft Dover District Local Plan, the council undertook a targeted Call for Sites exercise. This exercise helped identify additional site options, which were also subject to the same tests mentioned earlier on but at Regulation 19 stage. The additional reasonable site options were then also subjected to SA.

### Employment site options

**5.17** Employment site options were more limited and so the council reviewed and subjected its 23 existing employment sites in the district to SA to evaluate their potential for reallocation in the Draft Dover District Local Plan. Around this time, it was considered likely that more capacity would be required to deliver the council's Economic Strategy, so the council carried out a targeted Call for Sites exercise that included employment sites. New reasonable alternative site options identified through this exercise were then considered and subjected to SA as part of the preparation of the Regulation 19 Submission Dover District Local Plan.

**5.18** The employment site options were appraised in the same way as the residential site options, but with bespoke employment criteria and assumptions. The criteria are set out Appendix C of the September 2022 SA Report, in Table C.2 'Employment site assessment criteria and assumptions'. As was the case with the residential site options, the employment site options were initially appraised on a 'policy-off' basis and then on a 'policy-on' basis.

### Gypsy and Traveller site options

**5.19** During the preparation of the Draft Dover District Local Plan, three gypsy and traveller site options were identified for assessment, which covered existing sites potentially suitable for expansion and new locations. Two of these site options were considered reasonable alternatives and so were subjected to SA. During consultation on the Draft Dover District Local Plan, an additional five site options were identified for assessment. One of these sites was considered a reasonable alternative and so was subjected to SA. The SA of the gypsy and traveller site options followed the same process and assumptions as the residential site options.

**5.20** Following the processes outlined above, the council selected some of the site options for allocation in both the Draft (Regulation 18) and Submission (Regulation 19) Dover District Local Plans.

### Reasons for the selection and rejection of residential, employment and Gypsy and Traveller site options

**5.21** More detailed information about why individual site options were selected or rejected can be found in Appendix D of the September 2022 SA Report. Common reasons included:

- The proximity of sites to built-up areas where numerous services and facilities are present.
- The relationship to existing settlements.
- Sites identified for development in Neighbourhood Plans.
- Highways capacity.

- Alignment with the council's growth and spatial strategies and settlement hierarchy.
- Environmental constraints.
- Scope to deliver sustainable development, i.e. avoid or significantly mitigate any significant adverse effects identified through the SA.
- Location of sites within known opportunity areas.
- Alignment with the council's strategy for the rural area.
- Sites that provide logical extensions to existing settlements.
- Suitability for redevelopment/intensification.
- Availability of good transport connections.

## Main Modifications

**5.22** The April 2024 Main Modifications SA Addendum presents all of the proposed Main Modifications subject to SA. The nature of the proposed Main Modifications and proposed Policies Map Modifications does not result in the identification of reasonable alternatives that require consideration through the SA.

## Chapter 6

### How the environmental and sustainability effects of the adopted Local Plan will be monitored

**6.1** The SEA Regulations require that “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” (Regulation 17), and that the Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (Schedule 2).

**6.2** The Planning Practice Guidance on SA states that it is not necessary to monitor everything and monitoring should be focused on the significant sustainability effects, including significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken. However, in order to address the requirement in SEA Regulation 17 noted above to “identify unforeseen adverse effects at an early stage and be able to undertake appropriate remedial action”, and taking a precautionary approach, measures have been proposed to monitor sustainability effects for all the objectives in the SA framework.

**6.3** The indicators recommended to be used by the council to monitor the potential sustainability effects of implementing the Dover District Local Plan are set out in **Table 6.1** below.

**Table 6.1 Proposed monitoring indicators**

SA objective	Proposed monitoring indicators
SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	<ul style="list-style-type: none"> <li>■ Progress in the delivery of the Local Plan strategic and non-strategic housing allocations and dwellings by monitoring year and Plan period.</li> <li>■ Level and location (by settlement) of new windfall housing development by monitoring year and Plan period.</li> <li>■ Net annual affordable housing dwelling completions by tenure type and location/area within the district.</li> <li>■ Qualifying applications approved that have not met the affordable housing tenure split.</li> <li>■ Rural local needs housing dwellings permitted and completed, by tenure type and location/area within the district.</li> <li>■ Type and mix of homes permitted and completed.</li> <li>■ Number of custom and self-build plots approved and completed, by location/area within the district.</li> <li>■ Number of self-build plots returned unsold.</li> <li>■ Number and location of Houses in Multiple Occupation permitted by ward.</li> <li>■ Number of planning applications referred to a Design Review Panel.</li> <li>■ Number of applications where Design Codes have been prepared.</li> <li>■ Percentage of appeals allowed on design grounds.</li> <li>■ Percentage of new residential developments that meet the latest Nationally Described Space Standards.</li> <li>■ Percentage of units approved and completed which are: M4(2) accessible and adaptable dwellings compliant and M4(3) wheelchair use dwellings compliant.</li> </ul>

SA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> <li>■ Pitches permitted on intensification sites.</li> <li>■ Pitches lost.</li> <li>■ Pitches on alternative windfall sites permitted.</li> <li>■ Annual applications determined, which apply policy on extensions and annexes (permitted and refused).</li> </ul>
<p>SA 2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, well-being, recreation and integration.</p>	<ul style="list-style-type: none"> <li>■ Percentage change in life expectancy and levels of deprivation (Indices of Multiple Deprivation).</li> <li>■ Percentage change in crime levels.</li> <li>■ Number of cultural and public art projects delivered in the district.</li> <li>■ Air Quality Exceedances and number of new Air Quality Management Areas declared.</li> <li>■ Developer contributions secured to deliver public realm improvements.</li> <li>■ Amount and type of new strategic open space delivered.</li> <li>■ Amount and type of open space provided in new residential developments.</li> <li>■ Developer contributions received for open space projects.</li> <li>■ Number of new indoor and outdoor sports facilities and playing pitches provided and/or enhancements to existing.</li> <li>■ Developer contributions received for indoor sports facilities and outdoor playing pitches and sports facilities.</li> <li>■ Loss and gains of public open space and Local Green Space.</li> <li>■ Losses and gains of new, or enhancements to existing, community facilities</li> <li>■ Developer contributions received for community facilities.</li> <li>■ Percentage of new development enabling Fibre To The Premises.</li> </ul>
<p>SA 3: To deliver and maintain sustainable and diverse employment opportunities.</p>	<ul style="list-style-type: none"> <li>■ Gains and losses in employment floorspace.</li> <li>■ Location of new employment development.</li> <li>■ Applications for businesses operating from a residential property.</li> <li>■ Progress in the delivery of the Local Plan employment allocations.</li> <li>■ Working age population, compared to Kent, the South East and the UK.</li> <li>■ Total jobs and job density, compared to Kent, the South East and the UK.</li> <li>■ Economic activity rate, compared to Kent, the South East and the UK.</li> <li>■ Resident Occupation Group, compared to Kent, the South East and the UK.</li> <li>■ Earnings by residence and workplace, compared to Kent, the South East and the UK.</li> <li>■ Level of unemployment, compared to Kent, the South East and the UK.</li> <li>■ Level of qualification attainment, compared to Kent, the South East and the UK.</li> <li>■ Gains and losses of tourism floorspace.</li> <li>■ Location of tourism floorspace.</li> <li>■ Gains and losses in retail floorspace and town centre uses.</li> <li>■ Progress in the delivery of the Dover Town Centre Strategy Plan and regeneration projects/Opportunity Areas.</li> <li>■ Town centre vacancy rates.</li> </ul>

SA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> <li>■ Use of Article 4 directions in town centres.</li> <li>■ Loss and gains of local shops.</li> <li>■ Applications for changes to shop fronts.</li> <li>■ Gains and losses of tourism by area of district: <ul style="list-style-type: none"> <li>– serviced visitor accommodation (hotels and B&amp;Bs);</li> <li>– self-catering tourism accommodation (caravans, camping, glamping, lodges, huts, treehouses, and pods); and</li> <li>– other tourism uses (including holiday lets).</li> </ul> </li> </ul>
SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	<ul style="list-style-type: none"> <li>■ Percentage increase in sustainable commuting.</li> <li>■ Number of electric vehicle charging devices in the district.</li> <li>■ Planning consents for home businesses.</li> <li>■ Public Rights of Way network gains and losses.</li> <li>■ Gains in pedestrian routes and cycle paths.</li> <li>■ Progress towards the delivery of strategic transport improvements for bus and rail.</li> <li>■ Section 106 and 278 Agreements signed relating to sustainable travel improvements.</li> </ul>
SA 5: To promote sustainable forms of development that maintain and improve the quality of the district's natural resources, including minerals, soils and waters.	<ul style="list-style-type: none"> <li>■ Percentage of brownfield and greenfield development.</li> <li>■ Average density of residential development in the district by settlement.</li> <li>■ Average domestic water consumption in the district.</li> <li>■ Average commercial water consumption in the district.</li> <li>■ Development permitted in Coastal Change Management Areas.</li> <li>■ Water quality of the River Dour.</li> </ul>
SA 6: To reduce air pollution and ensure air quality continues to improve.	<ul style="list-style-type: none"> <li>■ Number of Air Quality Management Areas in the district.</li> <li>■ Exceedance episodes of key air pollutants.</li> <li>■ Exceedance episodes of national air quality objectives.</li> <li>■ Air quality exceedances and number of new Air Quality Management Areas declared.</li> <li>■ Percentage increase in sustainable commuting.</li> <li>■ Number of electric vehicle charging devices in the district.</li> <li>■ Number of electric vehicles as a percentage of total vehicles.</li> </ul>
SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change.	<ul style="list-style-type: none"> <li>■ Number of properties/areas at risk of flooding in the district.</li> <li>■ Number of applications approved contrary to Environment Agency advice.</li> <li>■ Number of windfall applications approved and refused on sites at risk of flooding.</li> <li>■ Number of qualifying permitted developments incorporating Sustainable Drainage Systems.</li> </ul>
SA 8: To mitigate climate change by actively reducing greenhouse gas emissions.	<ul style="list-style-type: none"> <li>■ Percentage reduction in CO<sub>2</sub> emissions.</li> <li>■ Number of energy-efficiency measures installed in homes in the district.</li> <li>■ Number of public electric vehicle charging devices in the district.</li> </ul>



SA objective	Proposed monitoring indicators
	<ul style="list-style-type: none"> <li>■ Percentage of applications for new dwellings that demonstrate a 31% reduction below the Target Emission Rate or Future Homes Standard compliance.</li> <li>■ Percentage of applications for new dwellings and new non-residential buildings that demonstrate Building Research Establishment's Environmental Assessment Method (BREEAM) Very Good or Future Buildings Standard compliance.</li> <li>■ Percentage of new homes in the district with Energy Performance Certificates of A or B.</li> <li>■ Number of applications permitted for the generation of renewable or low carbon energy.</li> </ul>
<p>SA 9: To conserve, connect and enhance the district's wildlife habitats and species.</p>	<ul style="list-style-type: none"> <li>■ Impact on designated sites, including Special Area of Conservation, Special Protection Area and Ramsar sites</li> <li>■ Percentage Local Wildlife Sites in positive conservation management.</li> <li>■ Percentage Sites of Special Scientific Interest in favourable recovery.</li> <li>■ Additional land area designated and protected for biodiversity.</li> <li>■ Implementation of mitigation measures at the Thanet Coast and Sandwich Bay Special Protection Area.</li> <li>■ Ancient Woodland loss.</li> <li>■ Condition of Biodiversity Opportunity Areas.</li> <li>■ Condition of Nature Reserves and Local Wildlife Sites.</li> <li>■ Additional Tree Preservation Orders made.</li> <li>■ Biodiversity Net Gain, Habitat creation, restoration and management</li> </ul>
<p>SA 10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the district's historic environment.</p>	<ul style="list-style-type: none"> <li>■ Percentage of appeals dismissed on grounds of harm to a designated or non-designated heritage asset.</li> <li>■ Percentage of appeals dismissed on grounds of harm to a Conservation Area.</li> <li>■ Percentage of appeals dismissed on grounds of unjustified harm to assets of archaeological interest.</li> <li>■ Percentage of appeals dismissed on grounds of unjustified harm to a Registered Park and Garden.</li> </ul>
<p>SA 11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the district's settlements, coastline and countryside.</p>	<ul style="list-style-type: none"> <li>■ Major development proposals approved within the Kent Downs Area of Outstanding Natural Beauty.</li> <li>■ Retail and main town centre uses permitted outside of town centre boundaries.</li> <li>■ Number of public realm, cultural and public art projects secured by a Section 106 Agreement.</li> <li>■ Development permitted in Coastal Change Management Areas.</li> <li>■ Gains and losses of tourism floorspace by area of district.</li> <li>■ Public Rights of Way network gains and losses.</li> <li>■ Gains in pedestrian routes and cycle paths.</li> <li>■ New development outside of defined settlements.</li> </ul>