

# Worth Neighbourhood Development Plan:

## Reference Documents

Document Library, Habitat Regulations Screening  
Report and Sustainability Review



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# Document Library

## Pre-Submission Documents

**1.1** All Pre-Submission reference documents are listed below. They can be opened directly from this document or are available on the Parish Council website [www.worthparishcouncil.org.uk](http://www.worthparishcouncil.org.uk)

Table 1

Ref	Documents	
A	Pre-Submission NDP	<a href="#">Open</a>
B	Pre-Submission Annex	<a href="#">Open</a>
C	Sustainability Report	<a href="#">Open</a>
D	Community Flier	<a href="#">Open</a>
E	Exhibition Reminder Flier	<a href="#">Open</a>
F	Exhibition Material	<a href="#">Open</a>
G	Consultation List	<a href="#">Open</a>
H	Consultation Letter: <a href="#">Local</a> ; <a href="#">Non Local</a> ; <a href="#">email Local</a> ; <a href="#">email Non Local</a>	
I	Consultation Output	<a href="#">Open</a>

## Worth Parish Council (WPC) Documents

**1.2** All WPC reference documents are listed below. They can be opened directly from this document or are available on the Parish Council website [www.worthparishcouncil.org.uk](http://www.worthparishcouncil.org.uk)

Table 2

Ref	Documents	
<b>Front Runners Grant Application</b>		
1	Dover District Council Application Letter	<a href="#">Open</a>
2	Letter from Worth Parish Council to DDC	<a href="#">Open</a>
<b>Neighbourhood Area</b>		
3	Application Letter to Dover District Council	<a href="#">Open</a>
4	Flier (delivered to all households in the Parish)	<a href="#">Open</a>
5	Consultation Responses (opens DDC consultation website)	<a href="#">Open</a>
5b	Approval Notice (Displayed on Notice Board; see also Jan 2013 Community Newsletter)	<a href="#">Open</a>
<b>Interim Consultation</b>		
6	Community Flier	<a href="#">Open</a>
7	Response Form	<a href="#">Open</a>
8	Issues - Consultative Draft	<a href="#">Open</a>
9	Evidence Base - Consultative Draft	<a href="#">Open</a>
10	Decision Framework & Sustainability Checklist - Consultative Draft	<a href="#">Open</a>
11	Consultation Responses & WPC Position	<a href="#">Open</a>
12	Agreed Changes to Documents	<a href="#">Open</a>
<b>Statutory and Invitee Consultation</b>		
13	Statutory Consultees and List of Invited Consultees	<a href="#">Open</a>
14	Dover District Council Consultation Letter	<a href="#">Open</a>
15	Worth Parish Council Letter to Statutory & Major Consultees	<a href="#">Open</a>

16	Worth Parish Council Letter to Local Businesses	<a href="#">Open</a>
17	Worth Parish Council Letter to Local Associations & Councillors	<a href="#">Open</a>
18	Map accompanying letters	<a href="#">Open</a>
19	Worth Parish Council Letter to Parish & Town Councils: <a href="#">Eastry</a> ; <a href="#">Northbourne</a> ; <a href="#">Sholden</a> ; <a href="#">Cliffsend</a> ; <a href="#">Sandwich</a> ; <a href="#">Woodnesborough</a>	
20	<b>All Responses to the Consultation</b> Statutory & Major Consultees: <a href="#">Environment Agency</a> , <a href="#">Kent County Council</a> , <a href="#">Kent Wildlife Trust</a> , <a href="#">Natural England</a> , <a href="#">River Stour IDB</a> , <a href="#">Southern Water</a> , <a href="#">Sports England</a> , <a href="#">Stagecoach E.K.</a> Local Businesses: <a href="#">Beans (Farmer)</a> , <a href="#">Bisley Nurseries (Farmer)</a> , <a href="#">Stevens (Farmer)</a> , <a href="#">Sandy Hobbs (B&amp;B)</a> , <a href="#">Parish Hall Management</a> Local Associations & Councillors: <a href="#">KALC</a> , <a href="#">Neighbourhood Watch</a> Parish & Town Councils: <a href="#">Sandwich TC</a> , <a href="#">Sholden CP</a> Members of the Public: <a href="#">Mr Lance Austin</a>	
21	Worth Parish Council Response to all feedback	<a href="#">Open</a>
<b>General and Development Surveys</b>		
22	Inception Meeting Invite	<a href="#">Open</a>
23	Inception Meeting Slides	<a href="#">Open</a>
24	Questionnaire	<a href="#">Open</a>
25	Exhibition	<a href="#">Open</a>
26	General Survey Results	<a href="#">Open</a>
27	Development Survey Results	<a href="#">Open</a>
<b>Site Allocation Survey</b>		
28	Survey	<a href="#">Open</a>
29	Supplement	<a href="#">Open</a>
30	Full Output	<a href="#">Open</a>
31	Output Map	<a href="#">Open</a>
32	Parish Council Open Meeting Presentation	<a href="#">Open</a>
33	Residents Flier (independently included Site Allocation Data)	<a href="#">Open</a>
34	See Also - Parish Council Response to DDC Interim Site Consultation	<a href="#">Open</a>
<b>NDP Survey</b>		
35	Questionnaire	<a href="#">Open</a>
36	Exhibition	<a href="#">Open</a>
37	Jubilee Road Site (provided by landowner)	<a href="#">Open</a>
38	Bisley Site (provided by landowner)	<a href="#">Open</a>
39	Survey Results	<a href="#">Open</a>
40	Caspell Letter (withdrawing site up Jubilee Road)	<a href="#">Open</a>
<b>Worth Parish Council Newsletters</b>		
41	Worth Parish Council Newsletters: 2012: <a href="#">01. March</a> , <a href="#">02 May</a> , <a href="#">03 July</a> , <a href="#">04 September</a> 2013: <a href="#">05 January</a> , <a href="#">06 March</a> , <a href="#">07 May</a> , <a href="#">08 July</a>	
<b>Housing</b>		
42	Housing Density	<a href="#">Open</a>
<b>Traffic Surveys</b>		
43	Traffic Survey, Crude Data from 2011	<a href="#">Open</a>
44	Map based on traffic survey	<a href="#">Open</a>
45	Felderland Lane data 2012 & Letter from Residents	<a href="#">Open</a>
<b>Additional Housing Site Information</b>		
46	Land behind The Street (Housing Site D10); Consultation Response Correspondence	<a href="#">Open</a> <a href="#">Open</a>
46a	Kent County Council, Deal Road Site	<a href="#">Open</a>

47	Land West of Jubilee Road (Housing Site D12); Correspondence	<a href="#">Open</a>
48	Updated design proposal from the agent for Land at Bisley Nursery (Housing Site D8/9))	<a href="#">Open</a>
<b>Affordable Housing</b>		
49	Worth Parish Council Letter (delivered with the survey)	<a href="#">Open</a>
50	Survey (delivered to all households in the NDP area)	<a href="#">Open</a>
51	Survey Results	<a href="#">Open</a>
<b>Councillor's Interests</b>		
52	Councillor Declared Interests November 2012	<a href="#">Open</a>
53	Councillor Dispensations	<a href="#">Open</a>

## External Documents

**1.3** All external documents are listed below. They can be opened directly from this document or are available on the Parish Council website [www.worthparishcouncil.org.uk](http://www.worthparishcouncil.org.uk)

Table 3

ED	Documents	
<b>Landscape Assessment of Kent</b>		
ED1	Landscape Assessment of Kent Part 1	<a href="#">Open</a>
ED2	Landscape Assessment of Kent Part 3	<a href="#">Open</a>
<b>Demographic Data</b>		
ED3	1981 Census (downloaded from Office For National Statistics)	<a href="#">Open</a>
ED4	1991 Census (downloaded from Office For National Statistics)	<a href="#">Open</a>
ED5	2001 Census (downloaded from Office For National Statistics)	<a href="#">Open</a>
ED6	2011 Census (downloaded from Office For National Statistics)	<a href="#">Open</a>
ED7	Demographic Forecasts for Dover District Council by Research Intelligence	<a href="#">Open</a>
ED8	Strategic Housing Market Assessment for the East Kent Sub-region	<a href="#">Open</a>
<b>Dover District Council Documents</b>		
ED9	Adopted Core Strategy	<a href="#">Open</a>
ED10	Core Strategy Sustainability Appraisal and Habitats Regulations Assessment	<a href="#">Open</a>
ED11	Habitat Regulations Assessment of the Dover LDF Core Strategy	<a href="#">Open</a>
ED12	2008 Draft Site Allocations	<a href="#">Open</a>
ED13	2009 SHLLA	<a href="#">Open</a>
ED14	2011 Interim Site Consultation	<a href="#">Open</a>
ED15	2012 Draft Land Allocations Local Plan, submitted August 2013	<a href="#">Open</a>
ED16	Emerging Heritage Strategy	<a href="#">Open</a>
<b>National Planning Policy &amp; Documents</b>		
ED17	National Planning Policy Framework	<a href="#">Open</a>
ED18	National Planning Policy Framework Key Parts	<a href="#">Open</a>
ED19	The Neighbourhood Planning (General) Regulations 2012	<a href="#">Open</a>
ED20	The Neighbourhood Planning (General) Regulations 2012 Explanatory Memorandum	<a href="#">Open</a>

**Worth Neighbourhood Development Draft Plan 2013  
Habitat Regulations Screening Report**

**Prepared for Worth Parish Council by Dover District Council;  
Approved by Natural England**

## Worth Neighbourhood Development Draft Plan 2013

### Habitat Regulations Screening Report

#### Introduction

This screening report has been prepared to assist Dover District Council to decide if an appropriate assessment of the Worth Neighbourhood Development Plan is required under the EU Habitats Directive. These regulations require that Assessments are undertaken for plans and programmes in order to identify any significant effects that the plan might have on Environmental criteria or Habitats in the implementation of the plan.

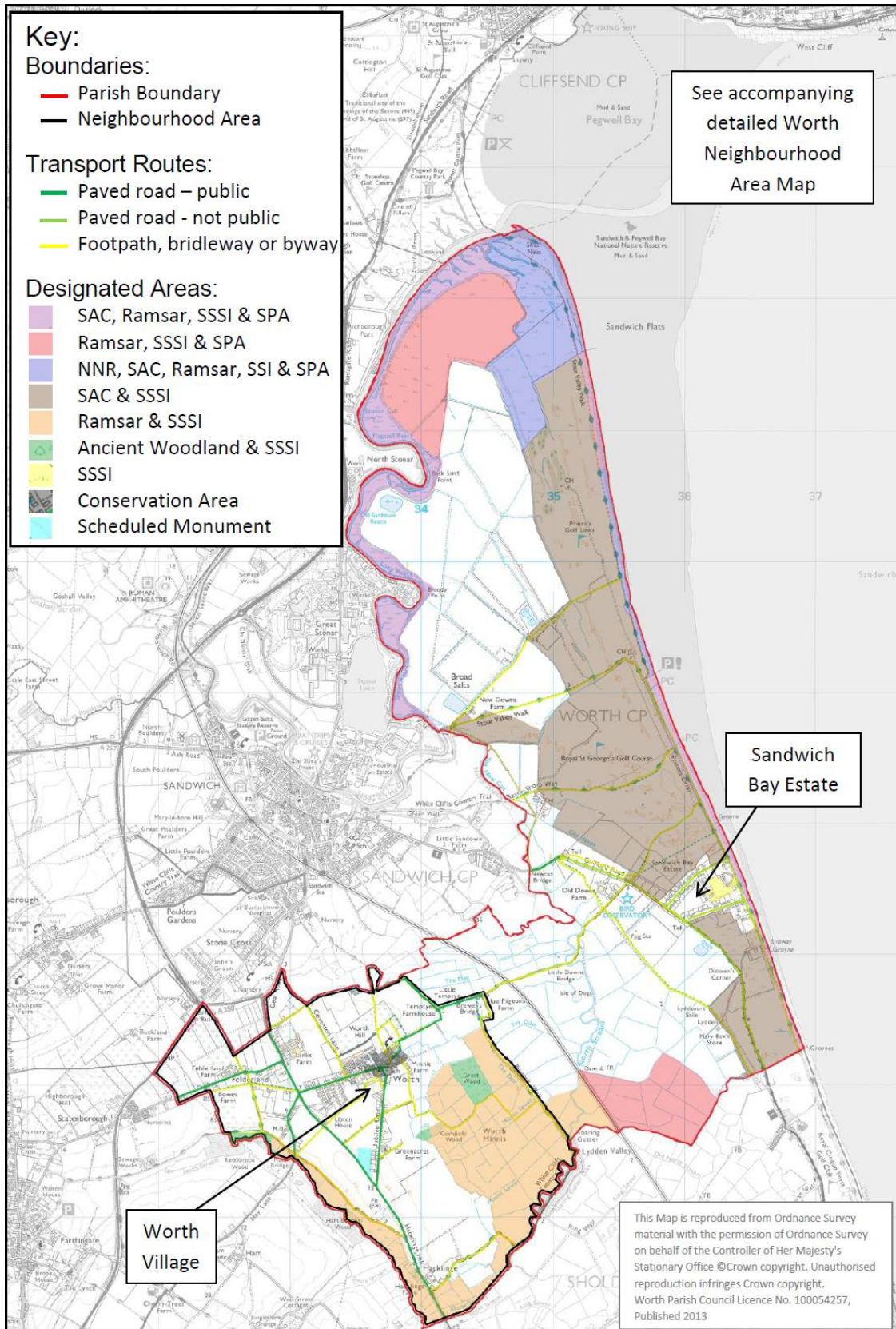
The Worth Neighbourhood Plan is a document that is intended to form part of the Statutory Planning Framework for the Dover District, following the process set out in the 2011 Localism Bill and the 2004 Town and Country Planning Act (as amended) and associated Regulations. These state that a Neighbourhood Development Plan must be in 'general conformity' with the 'strategic policies' of the planning framework, which currently consists of the Dover District Core Strategy. The adoption of the Core Strategy document has been subject to both a Strategic Environmental Appraisal and a Habitat Regulations Screening Report, which have been accepted as an appropriate assessment of the plan.

The Land Allocations Local Plan is still at the submission stage. The earlier draft of this document, the 2008 Preferred Options Land Allocations Document, included development sites in Worth but the 2012 Pre-Submission Plan, reflecting the progress of the Neighbourhood Plan, has not. Each plan was tested and accompanied by a HRA/AA, which have also been used to inform this screening.

#### European Designated Habitats

The Thanet Coast and Sandwich Bay Ramsar site occupies the eastern third of the Neighbourhood Area. In addition, three European designations outside of the Area fall within the Parish. The suite of sites is listed below and illustrated on Map 1.

Thanet Coast SAC:	Designated for its reefs and sea caves, both of which are effectively inaccessible from land.
The Sandwich Bay SAC:	Essentially designated for its sand dune succession including: <ul style="list-style-type: none"> <li>▪ Embryonic shifting dunes;</li> <li>▪ Shifting dunes along the shoreline with marram;</li> <li>▪ Dune Grassland;</li> <li>▪ Dunes with creeping willow; and</li> <li>▪ Humid dunes</li> </ul>
Thanet Coast & Sandwich Bay SPA:	Designated for populations of European importance of the following migratory species: <ul style="list-style-type: none"> <li>▪ Turnstone (wintering)</li> <li>▪ Golden Plover (wintering) and;</li> <li>▪ Little Tern (breeding)</li> </ul>
The Thanet Coast & Sandwich Bay Ramsar Site:	Designated as a Ramsar site (wetland of international importance under the Ramsar Convention) for its population of turnstone and also for supporting 15 British Red Data Book wetland invertebrates, primarily at Hacklinge Marshes.



The Key Environmental Conditions and the threats to these designations are set out in the HRA of the Land Allocations Pre-Submission Local Plan (December 2012). The predominant threats to the designations identified are water quality, water resources and recreational pressure/disturbance. The Thanet Coast SAC is not considered to be threatened by recreation pressure/disturbance due to the nature of the designation (reefs and caves) and its location. The effect of urbanisation (such as the impact of cats) has not been identified as an issue.



### **Worth Neighbourhood Development Plan Policies**

The Worth Neighbourhood Development Plan includes five planning policies that would need to be screened for their individual and in combination effects on the European Nature designations. These are listed below.

Policy Number	Description of Policy
WDP 01 Bisley Nursery Development	Allocation for approximately 30 dwellings together with public open space.
WDP 02 Additional Development Proposals	Design guidance for additional development within the settlement confines.
WDP 03 Local Green Spaces	Protection of open spaces between developed parts of the village
WDP 04 The Worth Centre Buildings	Existing employment development.
WDP 05 The Old Mill Buildings	Site for small mixed use development.

Given the nature of the predominant threats to the designations it is unlikely that Policies WDP 03 and WDP 04 would have a significant impact on them.

Urbanisation affects of the residential development on the Ramsar site has also been screened out because the nearest point of the Ramsar designation is over 500m from the proposed residential development.

### **Screening Process**

The steps involved in screening the Worth Neighbourhood Development Plan follow the methodology set out in the HRA for the Core Strategy and Land Allocations Local Plan.

The essential question is:

‘is the [plan] (or any part of the [plan]), either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?’

To understand whether the policies would result in a significant effect upon European sites, either alone or in combination, it is important to consider the conclusions of the assessments of the Core Strategy and Land Allocations Local Plan.

### **Summary of HRA Assessments to date**

#### **Habitat Regulations Assessment Core Strategy and Site Allocations Document Preferred Options (2008)**

All Preferred Options within the Core Strategy and all Site Allocations were scoped for potential conflicts with the European Sites. The majority of the Core Strategy policies were screened out as there was no scope for these to adversely effect European sites. Only ten were taken forward for screening. Ultimately none of the sites identified in the Site Allocation Document could be scoped out due to the potential for cumulative impacts on the sites.

It was considered that only six policies needed to be altered in order to conclude that the Core Strategy and Site Allocations DPD's were unlikely to lead to significant adverse effect on the European sites. The sites in Worth (identified in the Site Allocations DPD at that time) did not feature within the list of policies to be amended.

### **Habitat Assessment of the Pre-Submission Core Strategy (2009)**

The changes to the Core Strategy since the Preferred Options Draft, coupled with the changes in the practice devising mitigation measures for recreational effects on European sites, and further work that has been undertaken by the District Council (such as the Water Cycle Study and Green Infrastructure Strategy) led to a revision to the original recommendations in the Preferred Options HRA. The substantial increase in housing proposed at Whitfield, however, required an increase in the scale for further alternative natural green space to mitigate impacts.

### **Habitat Assessments of the Land Allocations Pre-Submission Local Plan (2012)**

The HRA concluded that the proposed developments would not have any significant effect on the Thanet Coast SAC. With regard to the Thanet Coast & Sandwich Bay SPA the HRA concluded that there could be an 'in combination' increase of approximately 10% to 14% in visitors from the Dover, Thanet and Canterbury districts over the period until 2031 (based on plans for the three areas). The HRA noted a small quantum of housing would be located at Worth and that would need to be assessed as there would be 'in combination' effect.

The issues of potential impacts on the SPA from new residential developments across Dover District were first identified in the HRA for the Core Strategy. Since that time the District Council introduced Thanet Coast and Sandwich Bay SPA and Ramsar Mitigation Strategy, which was devised with Natural England and other stakeholders. This strategy sought financial contributions from developers to address the cumulative 'in combination' recreational impacts on SPA.

The overall conclusions from the HRA was that, due to the existence of the Thanet Coast and Sandwich Bay SPA Mitigation Strategy and the requirement for all new residential developments to contribute to that, there would be no adverse effect on the integrity of the SPA or the Thanet Coast & Sandwich Bay Ramsar site.

### **Habitat Assessment of the Addendum to the Land Allocations Pre-Submission Local Plan (2013)**

The Addendum proposes changes to three residential allocations in the Pre-Submission Local Plan (two in Sandwich and one in Deal) but the overall number of properties has not changed. It has also introduced a new site at Preston and a new criterion based policy for convenience stores in Sandwich (it is proposed that the allocation in the Pre-Submission Plan is to be deleted).

The Addendum also proposes to include the Thanet Coast and Sandwich Bay SPA and Ramsar Mitigation Strategy into the Pre-Submission Land Allocations Local Plan in order to make the mitigation strategy an integral part of the Plan. The HRA considered that the strategy is a positive measure in that it provides a mechanism for mitigation of likely significant effects of new development on the aforementioned European sites. There are no material changes to it, and therefore no new considerations under HRA.

The HRA, therefore, concluded that the Addendum to the Land Allocations DPD would not lead to significant effects on any European sites considered as part of the HRA of the Pre-Submission version of the DPD.

## **Conclusions**

The predominant threats to the designations are water quality, water resources and recreational pressure/disturbance.

The HRA of the Pre-Submission Core Strategy concluded that the work undertaken as part of the Water Cycle Study provided evidence that mitigation measures were possible relating to the water quality and resources. This was, therefore, no longer of concern in the HRA. The Core Strategy identified the overall number of dwellings for the District and this included the allocation at Worth. Based on this evidence it is, therefore, unlikely that the allocations in the Worth Neighbourhood Development Plan would have a significant effect on the water quality and resources in the European Nature Conservation designated sites.

With regard to recreational pressure on the designations, the HRA's of the Core Strategy and the Land Allocations Local Plan concluded that with the introduction of the Mitigation Strategy and the requirement for all new residential developments to contribute to that, there would be no adverse effect on the integrity of the SPA or the Thanet Coast & Sandwich Bay Ramsar site. This Strategy, which will now form part of the Land Allocations Local Plan, will also be applicable to the residential allocations in the Worth Neighbourhood Development Plan. Policy WDP 01 also includes open space as part of the overall proposal. It is, therefore, concluded that it is unlikely that the proposed allocations would have a significant effect on the European designations.

# **Worth Neighbourhood Development Draft Plan 2013**

## **Sustainability Review**

**Prepared for Worth Parish Council by**  
**Levett-Therivel Sustainability Consultants**

The report by Levett-Therivel Sustainability Consultants was commissioned for the Pre-Submission Draft Plan. Although, the Submission Plan has not changed materially since the Pre-Submission Draft, Section & Page numbering have changed. For ease of reference the relevant Section and or Page number of the Submission Plan or Annex have been indicated in parentheses within the report.

## Report to Worth Parish Council

# Worth Neighbourhood Development Plan Sustainability Review

## Levett–Therivel Sustainability Consultants

4 April 2013

Contact: Roger Levett 0117 973 2378 [roger@levett-therivel.co.uk](mailto:roger@levett-therivel.co.uk)

39 Cornwallis Crescent Bristol BS8 4PH

### Introduction

This is an independent review, commissioned by Dover District Council, of how sustainability issues have been taken into account in the preparation of the Worth Neighbourhood Development Plan (NDP).

The Worth NDP is one of the first Neighbourhood Development Plans to be prepared under the Localism Act 2011. It is not, we believe, subject to statutory requirements for either Sustainability Appraisal or Strategic Environmental Assessment, and there are no direct precedents for sustainability appraisal of such plans.

In 2012 Levett-Therivel were commissioned to advise the Parish Plan Working Group (referred to below as just ‘the working group’) on how to take sustainability considerations into account in preparing it. We suggested a process drawing on the principles of statutory SA and SEA of higher level plans, but much briefer and simpler, proportionate to the nature and impacts of the NDP, and a cost effective contribution to making it as good as possible.

We suggested that at the end of the process ‘somebody should prepare a brief review report which ensures that sustainability issues really have been adequately considered, and explains how this has been done.’ We were subsequently commissioned to prepare such a review report. This is it. We hope it gives a clear and helpful picture of how the Worth NDP has taken sustainability into account, and that it will be a helpful example for subsequent NDPs.

### The sustainability appraisal process

We suggested that the Working Group prepared an SA report which showed that:

1. ‘You have collected evidence on the current planning context that affects the Worth NP
2. You have collected evidence on current social, economic and environmental conditions in the parish
3. You have identified a range of reasonable options for the NP, consulting widely on this
4. You have established a framework for testing the sustainability of your NP: various options, sub-components of the NP, and the overall NP once it is nearly completed

5. You have consulted with statutory consultees about all of the above
6. You have appraised the NP options, then sub-components and then overall NP, using your SA framework, involving as many people as you can to avoid any accusations of bias
7. Where your appraisal identifies negative impacts, you have considered whether and how these can be reduced (and positive effects enhanced)
8. You have set up a system for monitoring what the actual impacts of the NP are'.

The Working group has not produced a separate standalone SA report. Instead, these issues are addressed in the NDP itself and its annexes.

### **The review process**

This review report was prepared solely through desk study of these documents. After reading earlier drafts, we asked the Working Group for more detailed evidence and explanation on various points. This was provided promptly and unstintingly, in the form of considerable expansion of the annexes, enabling us to remove several recommendations made in the first draft of this review. We would like to record our thanks to the Working Group for responding positively to our requests and suggestions, and doing a great deal of work over a very short period.

In the time and budget available we have not sought any independent corroboration of these documents. We will be grateful if readers would inform us direct of any inaccuracies or errors.

### **Assessment**

The following sections set out how and where each of the 8 requirements above is addressed in the April 2013 pre-submission draft NDP or its annexes (available on the Parish Council website <http://www.worthparishcouncil.org.uk/NDP/>), and give our assessment of the adequacy of the work in the context of the purpose, contents and limitations of the NDP.

#### ***1: evidence on the current planning context that affects the Worth NP***

In our view Annex 1 (*Basic Conditions Statement*) summarises the relevant context satisfactorily and provides a robust basis for the NDP.

#### ***2: evidence on current social, economic and environmental conditions in the parish***

Sections 2 and 3 (*Area Portrait*) of the NDP provide evidence on social, economic and environmental conditions in the parish. We believe the information presented is relevant, proportionate and adequate to inform the NDP.

#### ***3: Identifying a range of reasonable options for the NP, consulting widely on this***

The main substantive issues addressed by the NDP are choice of sites for housing development and for Local Green Space designation. Annex 4.3 (*The Plan Annex, Pages 14-31*) describes the process of identifying and consulting the community on possible housing sites. Annex 5.1 (*The Plan Annex, Pages 34-44*) does the same for potential local Green Spaces. In both cases we believe the process was thorough, fair and effective in identifying a good and appropriate range of options and ascertaining the community's views on them.

Chapter 3 of the NDP also presents 12 (14) 'community objectives'. Annex 3.1 – 3.3 (*The Plan, Pages 12-30*) explains how the Working Group derived these from the planning context, the evidence on current conditions in the parish, and feedback from three rounds of community

consultation. There does not appear to have been any formal process of generating and comparing alternatives to these 12 (14) objectives. However they do follow naturally from the context, and the process of community consultation described appears to have been effective at confirming that these 12 (14) are supported by the community, fine-tuning their wording, providing an opportunity for people to suggest any further ones they felt were missing, and getting a steer on their relative priority for resources (discussed in annex 3.5) (*The Plan Annex, Page 11*) – the only sense in which they really are ‘alternatives’ to each other.

We therefore conclude that the process implicitly identified and consulted on options so far as this was practicable and helpful in the circumstances, and that any more elaborate and explicit process would have been artificial and add little value.

#### **4: establishing a framework for testing the sustainability of the NP**

The Sustainability Criteria Checklist, at Annex 2.3 (*The Plan Annex, Page 3*) The Plan Annex, is the appraisal framework. It is based on the appraisal framework used by the Dover District Council Core Strategy SA/SEA, with some modifications suggested by Levett-Therivel to make it more suitable for neighbourhood level appraisal, and some further ones made by the working Group. The reasons for these are not stated. However the result is similar to many such frameworks and within normal practice, except that there is no explicit reference to air quality. However this is implicitly covered under the health criterion, and traffic, the likely main threat to air quality is addressed by the transport criterion, so we think it very unlikely this will have made any significant difference to the appraisal results. We *recommend* inclusion of an explicit reference to air quality in any future revisions of this checklist, but do not think its absence detracts significantly from the validity of the appraisals using the current version.

#### **5: consultation with statutory consultees about all of the above**

This will be the next stage of the process.

#### **6: appraisal of options, components of the plan and then the whole Plan, using the SA framework.**

Annex 3 table 1 (*The Plan Annex, Page 5-9*), Annex 4 table 3 (*The Plan Annex, Pages 18-29*), and Annex 5 table 6 (*The Plan Annex, Pages 37-41*), appraise respectively the Community Objectives, the potential housing sites and the potential Local Green Spaces against the Sustainability Criteria Checklist. These appraisals all appear thorough, systematic and fair.

The appraisals of the Community Objectives reveal some strongly positive impacts for each of the objectives, and only a very small number of mildly negative impacts, confirming the desirability of these objectives.

The appraisals of the housing sites reveal a dramatic spread from sites that score strongly negatively on several criteria to ones that score strongly positively. Annex 4.5 (*The Plan Annex, Page 30*), explains how these results and community views were combined to reach a choice of sites that is both good for sustainability and consistent with community preferences.

The appraisals of the Local Green Space sites show one site scoring strongly negatively, one with no positive or negative scores, and all the others with varying numbers and strengths of positive scores. Annex 5.1 and 5.3 (*The Plan Annex, Pages 34-35 & Pages 35-44*), explain how these scores were taken into account together with a sophisticated analysis of which households preferred which sites to arrive at a permutation of sites which scores very well on sustainability as well as satisfying as many respondents as possible.

Relevant sustainability criteria are also referred to, to inform discussion of housing density in Annex 4.1 (*The Plan Annex, Page 13*) and general countryside protection in Annex 5.1 (*The Plan Annex, Page 33*).

The five numbered Planning Policies in chapter 4 of the NDP are appraised in Annex 6 (*The Plan Annex, Pages 44-47*). Two of them, WDP 01 and 03, primarily codify the decisions about housing and Local Green Space sites discussed elsewhere, and their highly positive appraisal scores reflect the thorough and careful consideration that went into them. The appraisals of the other three are mildly positive. The text of chapter 4 (*The Plan Annex, Page 13*) and Annex 6 (*The Plan, Pages 34-46*) explain how the (extensive) detailed conditions in WDP 01, and the remaining three policies, were derived from the community objectives, which, as we have already seen, scored well on their appraisal.

Annex 6 (*The Plan Annex, Pages 44 & 48*) concludes with a formal appraisal of the whole NDP against the sustainability criteria. This provides an overview of the overall highly positive predicted impacts of the NDP.

### ***7: Where the appraisal identifies negative impacts, considering whether and how these can be reduced (and positive effects enhanced)***

The process of choice of housing and Local Green Space sites described above showed how the sustainability appraisal was used effectively to avoid and reduce negative impacts.

The negative impacts of the Community Objectives are very few, mild, and difficult to mitigate at neighbourhood level, so we think the decision that they should just be accepted is reasonable.

### ***8: Setting up a system for monitoring the actual impacts of the NP***

This is not mentioned in the NDP. We *recommend* that the Working Group discuss with officers of Dover District Council what monitoring of the impacts specifically of this NDP might be practicable, proportionate and worthwhile in addition to their monitoring of the Dover Local Plan. (*see The Plan, Page 48*)

## **Conclusions**

Two necessary stages for thorough integration of sustainability, statutory consultation and a monitoring system, are yet to be done. Our findings rely entirely on desk study of the draft NDP and its annexes, without any external corroboration. They seek to reflect the nature and constraints of neighbourhood planning. They are based on our professional judgement, without benefit of precedents or guidance specific to this level of plan making.

Subject to these caveats, **our overall conclusion is that the draft Worth NDP, and the process of developing it, have taken account of sustainability considerations in a thorough, proportionate and effective way.** We particularly commend the way sustainability appraisal was combined with community inputs to drive the two most significant decisions in the NDP, about housing and Local Green Space sites.