



DARTFORD LOCAL DEVELOPMENT FRAMEWORK: Sustainability Appraisal/ Strategic Environmental Assessment



Dartford Core Strategy



Sustainability Appraisal Adoption Statement



September 2011



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1. INTRODUCTION

- 1.1 Dartford Borough Council adopted its Core Strategy on 29th September 2011. In preparing the Core Strategy the Council has undertaken a parallel process of sustainability appraisal and assessment of the potential impacts of the plan on internationally important conservation sites.
- 1.2 The purpose of this Sustainability Appraisal (SA) Adoption statement is to outline how the SA process has influenced and informed the Core Strategy's development process and demonstrate how responses to SA consultation have been taken into account. The Adoption Statement has been produced in compliance with the Environmental Assessment of Plans and Programmes Regulations 2004. It is required by the European Strategic Environmental Assessment Directive 2001/42/EEC.
- 1.3 This statement also sets out the conclusions of the Habitats Regulation assessment and how these have been taken into account in the Core Strategy. The assessment is required by the European Directive on Conservation of Natural Habitats and of Wild Fauna and Flora (the "Habitats Directive") (92/43/EEC) and the Conservation of Habitats and Species Regulations 2010.

Core Strategy Examination in Public

- 1.4 The Examination of the Dartford Core Strategy took place in May 2011. The Inspectors report (August 2011) has concluded that the Dartford Core Strategy has met all legal requirements concerning Sustainability Appraisal(SA) and Habitats Regulation Assessment(HRA). In particular the HRA has been updated by an addendum report (February 2011 vers 2 6.5.11) and together with accompanying minor changes to the Core Strategy addresses the matter of bird decline at the North Kent sites.

The changes recommended by the Inspector are set out in two Appendices to his report. All of the changes were proposed by the Council and do not alter the thrust of the Council's overall strategy. For the purposes of the Sustainability Appraisal process, none of these changes are considered significant nor likely to have a significant effect on the results of the appraisal.

2. HOW THE SUSTAINABILITY APPRAISAL PROCESS HAS INFORMED AND INFLUENCED THE CORE STRATEGY

- 2.1 The Core Strategy sets out Dartford Council's long-term vision and strategic objectives for development of the area up to 2026.
- 2.2 Planning legislation requires that the development plan documents, of which the Core Strategy is one, are subject to a Sustainability Appraisal. This is a systematic process that is designed to evaluate the predicted

social, economic and environmental effects of development. European and UK legislation require that the LDF is also subject to a Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Where significant adverse effects are predicted, the SEA aims to identify means to avoid or mitigate such effects. Government guidance advises that these two processes should be carried out together and requires the LDF to be subject to a SA incorporating SEA. The SA/SEA of the Dartford Core Strategy Submission Document has been prepared in accordance with these requirements.

- 2.3 During early 2005 a joint scoping process for Dartford and Gravesham was carried out to ensure that the SA covered key sustainability issues relevant to Dartford. Plans and programmes were reviewed and information was collated relating to the current and predicted social, environmental and economic characteristics of the areas.
- 2.4 From these studies, the key sustainability issues and opportunities associated with the Thames Gateway high levels of growth were identified. The scoping information was updated in 2007 and 2010.
- 2.5 An SA Framework was compiled and included 19 SA Objectives that aim to resolve the issues and problems identified, and have been used to appraise the Core Strategy during its production. Further updates to the SA Framework were made in 2007. The following is a revised list of the SA Objectives.

SA Objectives:

SA Framework - Theme	SA Objective
Balanced communities	Promotion of thriving and balance communities
Integrated communities	Enable interaction between existing and new communities
Accessibility	Enhance accessibility to jobs, education, services etc and for rural communities through non-car uses
Health	Improve health and well being and reduce health inequalities.
Phasing of supporting Infrastructure	Ensure provision of infrastructure is appropriately phased to facilitate access to new and existing communities
Housing	Ensure all have access to a good range of housing to meet all needs
Sustainable Design and Construction	Promotion of good practice
Environmental Health	Provide a healthy and safe environment
Economy and Employment	Promote a range of quality employment and sustainable economic growth
Landscape	Ensure that special and distinctive landscapes and townscapes, are conserved and enhanced
Land and soil quality	Maintain and improve the quality of land and soil
Biodiversity	Protect and enhance the biodiversity and abundance of habitats and species
Cultural Heritage	Protect and enhance cultural resources
Minerals	Encourage use of minerals which minimise impact on environment
Climate Change and	Address the causes of climate change through reducing

Energy	emissions of green house gases and that the borough is prepared for the impacts of climate change.
Air Quality	Protect and improve local and global air quality
Waste	Encourage sustainable waste management
Water	Protect and enhance the water environment and manage water resources in a sustainable way
Flooding	Reduce the risk of flooding

SA OF THE CORE STRATEGY

- 2.6 Each stage of the preparation of the Core Strategy (including Vision, Strategy Objectives, Issues, Strategic Topics and Options, Preferred Policy Approaches 2006, Preferred Options 2008, Submission Document 2010 and proposed changes 2011) was appraised systematically using the SA Objectives. Where significant adverse effects, including environmental effects, were predicted, the SA sought where possible to identify means of offsetting these effects. Where it was considered that there were opportunities to enhance the sustainability of the proposals, recommendations were made.

APPRAISAL OF THE LDF VISION AND STRATEGIC OBJECTIVES & REASON FOR CHOOSING THE PLAN OVER OTHER ALTERNATIVES

- 2.8 At a number of stages in the development of the plan Enfusion appraised the emerging LDF Vision and Strategic Objectives. Overall the LDF Vision and Strategic Objectives were found to have positive implications for sustainable development in the Borough.
- 2.9 An SA of the issues raised in a consultation document published by Dartford Borough Council in August 2005 ('A Postcard from the Future – Making Dartford a Good Place to Live') was undertaken in 2005. Following on from this, the Council prepared Strategic Options which were then appraised by Enfusion in relation to their comparative sustainability against the SA Objectives.
- 2.10 In 2007, the Council revisited the development of Strategic Options, with consideration given to previous SA findings. These new Strategic Options were subsequently appraised and recommendations carried forward to the 2008 Preferred Options Core Strategy document.
- 2.11 Alternative options were identified in response to the following key issues:
- Location of and quantity of land required for development
 - Employment development
 - Type of development at Ebbsfleet
 - Balancing employment and housing growth
 - Housing types
 - Developing sustainable communities
 - The types of community and retail facilities required
 - Role of the waterfront in regeneration
 - Protection of assets and residents health
 - Ensuring the viability of villages

- Traffic congestion
 - Carbon emissions
- 2.12 The specific alternatives considered and a summary of the reasons for progressing or rejecting them for plan making is set out in the SA report Addendum: SA/SEA of Proposed Changes May 2011 and more fully detailed in the SA Report August 2010. In most cases the option progressed performed better across the SA objectives than the alternatives. In a small number of cases a mixture of alternatives were taken forward to develop a more sustainable policy approach.
- 2.13 Initially the Council considered alternatives for the amount of planned growth. But this was ruled out on the basis that the Council had no realistic alternative but to follow the emerging Regional Spatial Strategy (RSS). In the later stages of plan preparation following the publication of the pre-submission Core Strategy, the Council considered a number of alternative housing delivery scenarios (Dartford Housing Scenarios Feb 2011). Assessment of alternative scenarios concluded that, whilst accepting there may be an element of under-delivery the plan's identified capacity of land supply (the RSS requirement), provided the greatest synergies between housing and infrastructure delivery and generally positive social, environmental and economic impacts. Management actions and triggers have been set out in the Core Strategy to respond to circumstances where delivery exceeds the RSS requirement or falls below an identified performance threshold. These triggers and actions will safeguard against potential negative outcomes resulting from a level of delivery which is different to that forecast.

CONCLUSIONS OF THE SA

- 2.14 Overall, the Core Strategy has been found to have both positive and negative sustainability effects. Positive benefits include: enhanced opportunities to adapt to climate change through increased green spaces and strong policies on water conservation; an increase in the availability of housing, particularly affordable housing; the enhanced attractiveness of the borough, through returning damaged and degraded land to good use and increasing green spaces; and better connectivity within and between areas, with positive benefits for community integration, public health and climate change. These positive benefits are dependent upon all elements of the plan being successfully implemented, in particular the delivery of strategic and local infrastructure to support development.
- 2.15 Potential negative cumulative affects were identified, which primarily result from the increase in development. This will create a significant increased demand for resources and infrastructure, which will result in increased waste production and an increase in the use of water and energy resources. Significant negative effects on air quality will result from construction and increased vehicle movement. There is also the potential for negative effects on biodiversity, increased exposure to flooding, and

less tangible effects on community identity and heritage in the face of significant physical, social and economic changes.

How environmental and sustainability considerations have been taken into account in the Core Strategy

- 2.16 The issues, set out above, have been highlighted throughout the Sustainability Appraisal process, with recommendations made for improvements to policies and mitigation measures suggested where appropriate. The Core Strategy document reflects these recommendations, and provides policies that seek to enhance and maximise opportunities for sustainable regeneration and offset the potential negative effects.
- 2.17 Dartford Council has given particular attention to providing policy mitigation to these predicted effects during the preparation of the Core Strategy, including strong policies relating to sustainable transport, water and energy, maximising benefits to existing communities, a wide mix of dwellings and green multi functional networks.
- 2.18 The SA of the Core Strategy has found that the document will make a significant contribution to the progression of Sustainable Development objectives for Dartford, within the context of the high level of population and employment growth proposed for the Borough. The combination of the policies provides extensive opportunities to enhance health, wellbeing, economic and social opportunities and the distinctive environment of Dartford Borough.
- 2.19 The SA considered the significant increase in housing figures proposed in the Core Strategy (a capacity of 17,300), although these did not represent a higher capacity than identified in the Preferred Options Document (15,700 plus 10%). This is subject to much stronger management in the final submission document, should adverse impacts arise and a range of actions have been identified to enable greater flexibility to manage delivery. A reduction in jobs has resulted from a re-assessment of delivery over the Plan period and further assessment of the balance between jobs and labour supply. The Core Strategy provides adequate management actions to ensure a balanced delivery of homes and jobs.
- 2.20 A detailed progression table setting of how SA recommendations have been incorporated into the Core Strategy can be found in Appendix X of the SA Report August 2010.

3 HOW CONSULTATION OF THE SA HAS BEEN TAKEN INTO ACCOUNT

- 3.1 The SEA Directive requires responses to consultation to be taken into account during the preparation of the plan or programme and before its adoption or submission to a legislative procedure.

- 3.2 Throughout the SA process there have been substantial opportunities for public and stakeholder consultation and comment. These comments have been considered in detail, taken up in further discussions with relevant respondents; and where appropriate have assisted in the scoping and appraisal process and used to inform the Core Strategy's policies and proposals.
- 3.3 The Core Strategy has been made available for public consultation at various stages of the preparation process. This has been accompanied by the relevant stage of both the SA and HRA full and non-technical reports. Hard copies have been made available at the Council's offices and libraries together with electronic versions being made available on the Council's web site. Appendix 1 contains a schedule of SA and HRA reports that have been made available for consultation.
- 3.4 Initially the draft SA approach and the proposals for testing the development planning process were written up into an SA Scoping Report that was sent to a wide range of organisations and also made available on the Council's website. As required by the SEA regulations, the Council undertook consultation on the scope of the appraisal with the Countryside Agency and English Nature (now Natural England), English Heritage, and the Environment Agency. Comments were invited and received from a number of other organisations, which also helped to improve the SA Framework.
- 3.5 Generally comments have been mainly positive with no explicit objections received during consultation phases. Where minor suggestions have been made, these have been used to refine the SA Framework and baseline assessment. Details of the organisations, comments and the Council's response are contained in Appendix III of the Submission Core Strategy SA Report August 2010.

4 THE HABITATS REGULATION ASSESSMENT (HRA)

- 4.1 The Council's sustainability consultants were commissioned to initially undertake a combined HRA for both Dartford and Gravesham Core Strategies.
- 4.2 An initial screening of the Core Strategies was undertaken in 2007 to determine whether the plans had potential to lead to adverse effects at nearby sites of European nature conservation importance
- 4.3 For both plans, it was considered that the key potential effects were likely to arise from the overall level of the development and that potential impacts identified arose from the effects of large scale cumulative, and in the main, not individual borough directly related development pressures from housing, industry and transport in the area. Only two European sites were considered to have potential for adverse effects. These were Thames Estuary and Marshes and Medway Estuary and Marshes. The main potential impacts identified were:

- Coastal squeeze and subsequent loss of habitat
 - Increased recreational pressure
 - Water and air quality
- 4.4 The Appropriate Assessment (AA) stage of the assessment was then undertaken at various stages of preparation of Dartford Core Strategy. An interim assessment was published with the Dartford Core Strategy Revised Preferred Options document in 2008. This provided stakeholders and the public the opportunity to comment on the work undertaken. The interim AA identified a number of cross cutting effects and these were further considered in future iterations of the AA and Core Strategy. The AA particularly focused on recreation and water quality as at this stage it was concluded, in agreement with Natural England, that the other issues were not going to be sufficiently influenced by the plan and did not need to be further considered.
- 4.5 The final AA concludes that the Dartford Core Strategy contains a number of policies that will help mitigate any adverse effects of proposed development in combination with other plans or programmes. The mitigation provided by the policies include: the implementation of a strategic network of green spaces, water conservation measures, measures to reduce the impact of development on water quality.
- 4.6 During the final stages of the preparation of the AA report, Natural England presented the preliminary findings of a report which indicated that there has been a decline in bird populations at the European sites. In the light of this evidence, an addendum to the HRA was produced in February 2011 and changes to the Core Strategy were proposed to acknowledge that at this stage it was not possible to conclude that no adverse impacts would arise from the plan, and to include triggers and management actions in the plan. These provide the mechanism to mitigate and/or avoid adverse impacts if future research findings identify the likelihood of adverse impacts from development proposed in the plan.

5 MONITORING ARRANGEMENTS

- 5.1 The SEA Directive states that member states should monitor the significant environmental effects of the implementation of plans and programmes so that unforeseen adverse effects can be identified at an early stage and appropriate remedial action can be taken. It is acknowledged that existing monitoring arrangements may be used to avoid duplication.
- 5.2 The Dartford Core Strategy contains a monitoring framework containing medium and long term targets together with a range of indicators to monitor performance and to assess the impact of plan policies. The framework is linked to the monitoring recommendations of the SA and the monitoring of potential significant effects that may arise through the implementation of plan policies. A number of the indicators identified are those recommended by the SA. Monitoring results will be reported through the Council's Annual Monitoring Report and on the Council's web site.

- 5.3 The Core Strategy identifies 5 potential adverse impacts, which have been informed by the SA. These include:
- Sustainable communities not materialising
 - Development not being focused in priority areas
 - Failure of centres to fulfil complementary roles
 - High environmental impacts
 - Quality development not achieved in transformational projects
- 5.4 Appropriate response triggers and a number of management actions have been set out in Table 5 of the Core Strategy, to redress adverse outcomes. This approach will ensure that where monitoring indicates any exceedance of environmental limits or where it may prejudice the achievement of sustainability objectives, the Council is able to take averse action.

References and web links

1. Conservation of Habitats and Species Regulations 2010
http://www.legislation.gov.uk/ukxi/2010/490/pdfs/ukxi_20100490_en.pdf
2. Dartford Core Strategy: Inspectors Report and appendices August 2011
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExamination.htm>
3. Dartford Core Strategy SA/SEA and appendices(CD02)
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExaminationLibrary.htm>
4. Dartford Housing Scenarios (EB9)
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExaminationLibrary.htm>
5. Dartford- SA addendum: SA/SEA of proposed changes May 11(CD07)
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExaminationLibrary.htm>
6. Dartford Core Strategy
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExamination.htm>
7. European Directive on Conservation of Natural Habitats and of Wild Fauna and Flora (the "Habitats Directive") (92/43/EEC)
http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm
8. European Strategic Environmental Assessment Directive 2001/42/EC
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32001L0042:EN:NOT>
9. Habitats Regulation Appropriate Assessment July 2003 (CD03)
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExaminationLibrary.htm>
10. Habitats Regulation Appropriate Assessment Update Version 2 (CD05)
<http://www.dartford.gov.uk/planningpolicy/CoreStrategyExaminationLibrary.htm>
11. The Environmental Assessment of Plans and Programmes Regulations 2004
http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

Appendix 1

SA and HRA Reports made available for Public Consultation

Document	Date
SA/SEA of Dartford and Gravesham LDFs: Scoping Report	March 2005
Dartford Core Strategy SA of Preferred Options : Technical report and non technical summary	June 2006
Dartford Core Strategy SA of Preferred Options: Technical report and non- technical summary	January 2008
Dartford and Gravesham Borough Councils: Appropriate Assessment Interim Report (includes screening report)	January 2008
Dartford and Gravesham Borough Councils: Appropriate Assessment Report	July 2010
Dartford Core Strategy Submission Document: Technical Report and non – technical summary	August 2010
Dartford Borough Council : Appropriate Assessment Report Addendum	February 2011 (vs 2 6.5.11)
Dartford Core Strategy Submission Document: Addendum SA/SEA of proposed changes	May 2011

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