

DARTFORD BOROUGH LOCAL PLAN REVIEW

Revised Sustainability Appraisal April 2004

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Sustainability Appraisal

1 Introduction

- 1.1 The advice contained within PPG12 (Development Plans) still remains as relevant today, as it did for the First Deposit Draft. Local authorities are expected to carry out a full environmental appraisal of their development plan policies and proposals, which should encompass social and economic issues as well as environmental ones. This revised ‘Sustainability Appraisal’ complies with such advice.
- 1.2 This revised Sustainability Appraisal is part of an ongoing process to assess each key stage of the Local Plan Review. As this accompanies the composite version of the Plan, this report assesses Second Deposit Changes and their subsequent Proposed Amendments.

2 The Appraisal Process at Second Deposit Stage

- 2.1 In the light of the objections received on the First Sustainability Appraisal, the appraisal process was refined and modified to ensure that a less biased, more thorough and transparent approach has taken place. In particular:

a range of officers throughout the Council have informed the debate with specialist knowledge, in order to assess policies comprehensively;
a policy evaluation sheet for each of the 209 policies has been completed. Due to the size of this ancillary document, it is not being circulated to consultees but is available for viewing for those wishing to do so;
this appraisal not only assesses new and replacement policies, it also re-evaluates the policies which have been amended so that a comparison between the First and Second Deposit Drafts can be made;
this appraisal uses the same format, evaluation process and assessment criteria as used in the First Sustainability Appraisal, to ensure consistency between different stages of the Plan.

- 2.2 This section explains how the policies in the Second Deposit Draft have been appraised. In progressing the Local Plan Review to Second Deposit Draft, there have been many changes to the Plan. Each of the 209 policies have been identified as:

N	New Policy
R	Replacement policy
A	Policy amended
FE	Policy amended for factual edit only
S	Policy remains the same
D	Policy deleted
Poor 1 st SA	Policy identified as being poor in the First Sustainability Appraisal

- 2.3 There is no need to re-appraise policies that have been deleted, remain the same or are only amended for factual edit in this document (as shown below):

Deleted policies	H1, H3, H4, H5, H7, H8, H9, H14, H16, H17, T5, GB10, R3, R6, CF3, CF4, LT1, LT2, NR19, C6, C7, RT2, MDS6, MDS9
Policies remaining the same	DD12, H6, H11, H12, H13, H15, H20, H23, E6, E9, E10, T1, T13, T15, GB1, GB3, GB7, CF5, CF6, LRT8, LRT14, BE1, BE2, BE4, BE5, BE6, BE7, BE8, BE9, BE10, BE12, BE16, NR2, NR3, NR4, NR14, NR16, NR21, NR23, C3, C4, C5, C8, C9, C10, C11, C15, C18, C19, C20, C21, RT4, TC1, TC5, TC6, TC8, TC9
Policies that have factual edits only	DD7, DD13, DD14, T6, T10, T16, T17, GB5, CF1, LRT7, LRT16, BE15, NR20, C17, TC3, MDS2

2.4 The remaining 112 policies have been assessed in this Sustainability Appraisal and include:

New policies	H1a, H1b, H1c, T19, T20, NR6b, C4a, RT2a, RT4a, TC10
Replacement policies	H1, H4, H8, H16, H17, GB10, CF3, LRT1, LRT2, C6, RT2
Amended policies	DD1, DD2, DD3, DD4, DD5, DD6, DD9, DD10, DD11, H2, H10, H18, H19, H21, H22, E1, E3, E4, E7, E8, T3, T4, T7, T8, T9, T11, T14, T18, GB2, GB4, GB6, GB8, GB9, R1, R2, R4, CF2, LRT3, LRT4, LRT5, LRT6, LRT9, LRT10, LRT11, LRT12, LRT13, LRT15, BE3, BE11, BE13, BE14, BE17, NR1, NR5, NR6, NR7, NR8, NR9, NR10, NR11, NR12, NR13, NR15, NR17, NR18, NR22, C1, C2, C12, C13, C16, RT1, RT3, RT5, RT6, TC2, TC4, MDS1, MDS4, MDS5, MDS7, MDS8
Poor 1 st SA policies	DD8, E2, E5, T2, T12, R5, C14, TC7, MDS3

2.5 These 112 policies have been subjected to the same evaluation process as the First Sustainability Appraisal. Each policy has been assessed against the same 11 criteria and 36 tests (as shown below and in Appendix 1).

Criteria
Global Sustainability
<ul style="list-style-type: none"> • Transport Energy Efficiency • Resource Use, Energy & Waste
Natural Resources
<ul style="list-style-type: none"> • Pollution • Natural Environment
Local Environmental Quality
<ul style="list-style-type: none"> • Urban Environment • Cultural Heritage • Public Access to Open Space
Economy, Social Cohesion & Choice
<ul style="list-style-type: none"> • Living Accommodation • Economic Development • Health, Safety & Security • Community

- 2.6 The results of the evaluation have been recorded on policy evaluation sheets. An example can be found in Appendix 2. Appendix 3 provides a summary of the results found in the policy evaluation sheets. It is this summary which will form the focus of the rest of this document.
- 2.7 It will be seen from both Appendix 2 and Appendix 3 that a variety of symbols have been used to depict the type of impact that the policy has on a particular criteria. These categories (or symbols) include:

×	the policy/proposal makes a negative impact;
?	the impact of the policy/proposal is unknown;
◆	the policy/proposal is balanced (the impact is both negative and positive);
■	the policy/proposal has no impact;
✓	the policy/proposal makes a positive impact;
∨	the policy is slightly worse even though it remains in the same category as before;
▲	the policy is slightly better even though it remains in the same category as before;
∨∨	the category has changed for the worse making the policy less sustainable than before;
▲▲	the category has changed for the better making the policy more sustainable than before.

- 2.8 Appendix 3 lists all of the 209 policies, showing an overarching category for each of the 11 criteria (except for policies that have been deleted). Even policies that remain the same or contain factual edits are listed (shown in grey font) and new and replacement policies are highlighted with grey background. This enables a full and comprehensive sustainability analysis of the Second Deposit Draft.
- 2.9 Like the first, the Second Deposit Draft also recognises that all development will have some kind of negative impact on the Borough. Sustainability is about protecting and enhancing the best features whilst reducing those negative impacts to a minimum and mitigating negative effects in such a way that development can still occur in suitable locations. This appraisal highlights those instances where policies and proposals in the Plan do not go this far. It is therefore those policies that make a significant negative contribution towards achieving sustainability objectives that need to be treated most carefully and will be considered in the main findings in Appendix 4. Where negative impacts do arise, these will be assessed and the reasons for retaining such policies/proposals will be explained. Appendix 4 also identifies those policies which have changed so that they have become much less sustainable than before.

3 Summary of Appraisal at Second Deposit Stage

- 3.1 The overall assessment regarding this Sustainability Appraisal is encouraging. All of the new and replacement policies are sustainable as no negative impacts have been identified.

- 3.2 41% of the policies in the Second Deposit Draft have been amended. 89% of these amended policies are getting better or more sustainable whilst 4% are becoming less sustainable, e.g. policies E1 and E3. Some amended policies such as E4 and T3 contain negative impacts.
- 3.3 Nine policies were identified in the First Sustainability Appraisal which did not fare so well in the appraisal and included 'negative contributions'. This appraisal process has influenced the deletion of policies DD8, E5 and T12, along with other factors. Policies E2 and MDS3 have been amended, making them more sustainable than before. Although policies T2 and C14 remain the same, a re-evaluation has identified them to be more sustainable than originally assessed. Policies R5 and TC7 on the other hand still have negative impacts but there are good reasons for retaining these unchanged.
- 3.4 Amended policy H19 has been identified as having a negative impact with regard to criteria 7, access to open space. As a direct consequence of this finding, amendments have now been made to paragraph 3.19.2 of the Second Deposit Draft so that adequate amenity space will be provided in special needs accommodation. The category shown in Appendix 3 has been subsequently upgraded to a balanced impact to show the current position.
- 3.5 As a conclusion to this revised Sustainability Appraisal, no further amendments are required to make the Second Deposit Draft more sustainable. Policies E4, T3, R5, and TC7 contain negative impacts and are therefore the least sustainable policies in the Plan. There are however good reasons for retaining these policies, and a detailed explanation is provided in Appendix 4.

4 The Appraisal Process at Proposed Amendments Stage

- 4.1 Since the Second Deposit Draft of the Local Plan Review, Proposed Amendments have been made to the Plan, and were approved by the General Assembly of the Council on 26 January and 26 April 2004.
- 4.2 For consistency, the same appraisal process (format, evaluation technique, assessment of 11 criteria and 36 tests, symbols showing categories of impact and degree of change) has been used at Proposed Amendments stage as has been used before. Policy evaluation sheets have been completed for 28 policies, including two new policies as well as re-evaluating policies that have been substantially amended in substance. This ensures consistency between the different phases of the Plan and allows comparisons to be made between these different phases. Furthermore, the findings of the Sustainability Appraisals carried out as part of the LPR process will be rolled forward, to inform the Local Development Framework (LDF), as and when it is prepared.
- 4.3 The 28 relevant policies at Proposed Amendments stage that have been assessed include:

New policies	GB11, TC11
Deleted policies	TC3
Deleted policies now with Replacement policies	R1, NR10, NR11, NR12, C6

Amended policies	DD1, H1, H2d, H16, H18, T7, GB4, GB5, GB7, GB9, GB10, R2, CF6, LRT1, BE11, NR6, RT1, TC10
Poor 1 st or 2 nd SA	T3, MDS3

4.4 Appendix 5 provides a summary of the results found in the Policy Evaluation Sheets. It lists all 28 policies, showing an overarching category for each of the 11 criteria. New and replacement policies are highlighted with a grey background whilst deleted policies are not assigned categories. Appendix 6 is useful in that it provides a table highlighting how policies have changed from the First Deposit, through the Second Deposit to the subsequent Proposed Amendments stage. Appendix 7 presents the main findings of the Sustainability Appraisal at Proposed Amendments stage and focuses on policies that make a negative contribution towards achieving sustainability objectives or are becoming less sustainable than before. Where negative impacts do arise, it provides reasons for retaining such policies.

5 Summary of Appraisal at Proposed Amendments Stage

5.1 The overall assessment regarding the Sustainability Appraisal at Proposed Amendments stage is encouraging. 14% of the policies have been changed as part of the Proposed Amendments to the Second Deposit Draft. 85% of these policies are getting better or more sustainable whilst 12% are becoming slightly worse and 3% are becoming less sustainable. All of the policies that contain criteria that are becoming slightly worse are offset by other criteria that are becoming slightly better or more sustainable.

5.2 Only one policy is becoming less sustainable than before. Policy GB9 has changed from a positive to a negative impact in relation to the category living accommodation. This is a result of the loss of potential future residential development on the Oakfield Lane Campus site in favour of retaining school facilities. There are, however, good reasons for retaining this policy intact. The justification is set out in Appendix 7.

5.3 Out of the two new policies, only one contains a negative impact. Policy TC11 does not fare well in relation to the category of cultural heritage as a large scale regeneration scheme at Lowfield Street will result in the loss of existing old buildings. Once again, Appendix 7 explains why the policy should remain unchanged. Policy GB11 is assessed as having a neutral impact on the overall sustainability of the Plan.

5.4 None of the five replacement policies have negative impacts. Some replacement policies such as R1 have merely been reworded and have no additional impacts, either positive or negative.

5.5 The Proposed Amendments have not made those policies that did not fare so well in the previous Sustainability Appraisals more sustainable. For example, policies R5 and TC7 were identified as not faring well in the First Sustainability Appraisal (Poor 1st SA) and these two policies still contain negative impacts now. Policies T3 and E4 were identified as not faring well earlier in this Revised Sustainability Appraisal (Poor 2nd SA) and these still contain negative impacts. Now amended policy GB9 and new policy TC11 contain negative impacts or are becoming less sustainable too.

- 5.6 At Proposed Amendments stage, six policies T3, E4, GB9, R5, TC7 and TC11 are the least sustainable policies in the Plan. There are, however, good reasons for retaining these policies and a detailed explanation is provided in Appendix 7. As such, this appraisal identifies that no further amendments are required at this stage in the Plan process.
- 5.7 It will, however, be important to re-evaluate these six policies if they are brought forward into the new LDF so that they can be thoroughly assessed against the new strategy, objectives, core policies and area action plans contained within the new style Plan.
- 5.8 The policy evaluation process and the general approach used to conduct Sustainability Appraisals will also need to be revised and updated in the future. The new LDF process requires a Sustainability Appraisal and a Strategic Environmental Assessment to be carried out at different phases of the Plan, in accordance with Government policy (draft PPS12) and the 2001/42/EC Strategic Environmental Assessment Directive.