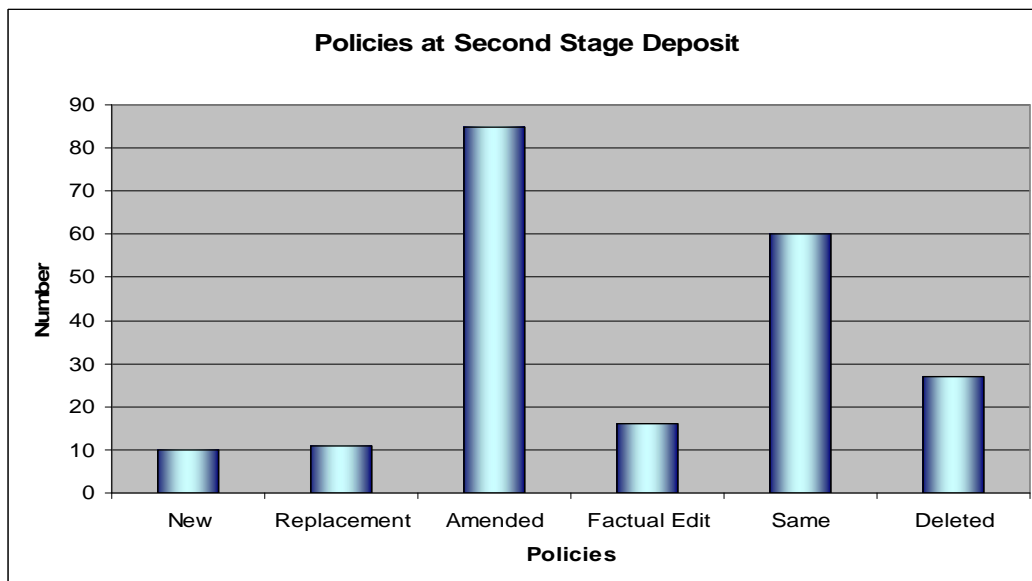


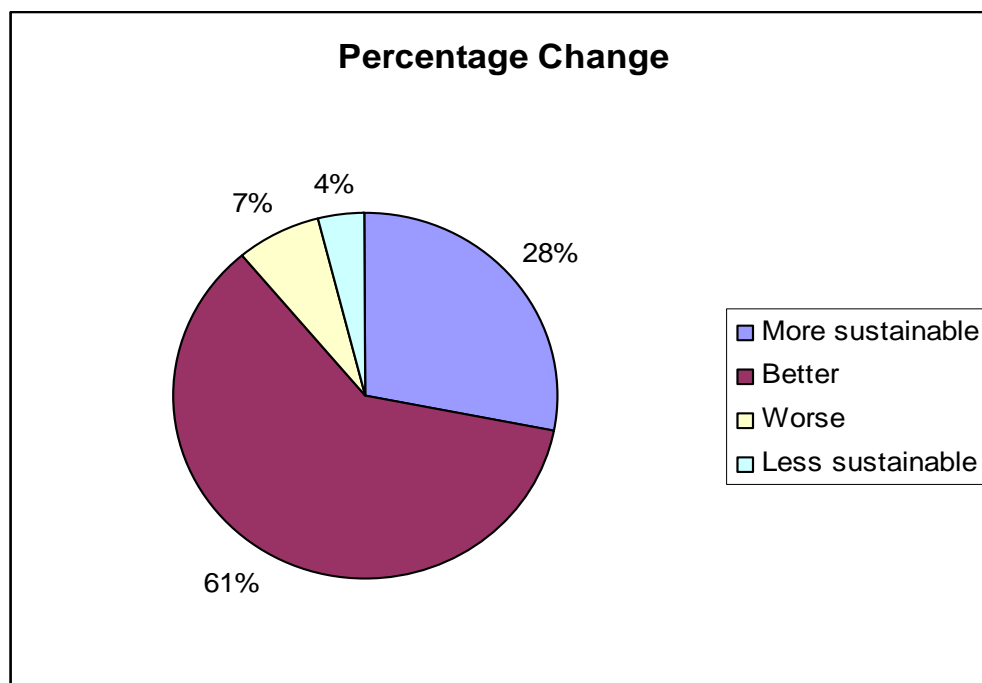
Appendix 4 Main Findings of Sustainability Appraisal at Second Deposit Stage

6 Initial findings

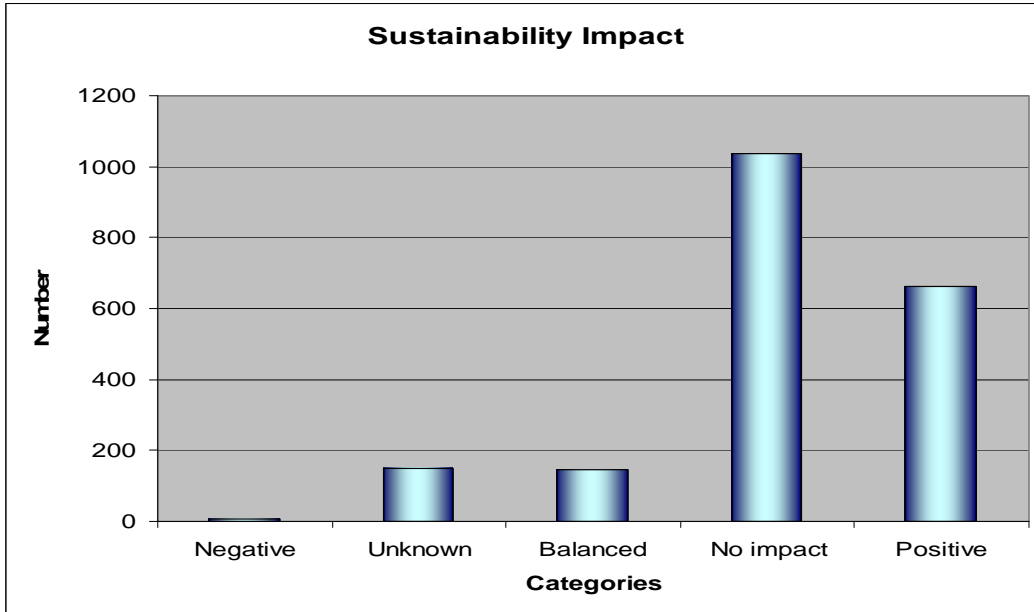
6.1 This summary sets out the main findings of the Sustainability Appraisal, interpreting the results found in the summary sheets in Appendix 3. The diagram below shows that the majority of policies (41%) have been amended since the First Deposit Stage of the Local Plan Review, although many policies have also stayed the same (29%).



6.2 As can be seen from the next diagram, 89% of the policies which have been amended from First to Second Stage Deposit are getting better or more sustainable, with only 11% getting worse or less sustainable.



6.3 The next diagram shows that in the 11 criteria assessed for each policy, the majority are categorised as no impact or positive impact. Overall, the Local Plan Review at the Second Deposit Stage is sustainable, with only 1% of the whole criteria tests containing negative impacts in 4 policies. This compares with 8 policies in the First Deposit Draft.



6.4 All 10 of the new policies in the Second Deposit Draft including H1a, H1b, H1c, T19, T20, NR6b, C4a, RT2a, RT4a and TC10 contain either positive, balanced or no impacts within their criteria tests. These new policies generally can be viewed as improving the sustainability of the Plan overall. Furthermore, it brings a degree of control to additional types of land use too.

6.5 Like the new policies, all 11 of the replacement policies identified in the Second Deposit Draft including policies H1, H4, H8, H16, H17, GB10, CF3, LRT1, LRT2, C6 and RT2 have criteria tests with categories allocated as positive, unknown or no impacts. Each of these policies can be viewed as being sustainable and make the Plan as a whole, generally more sustainable than before.

6.6 From this initial assessment, it is evident that some of the policies need to be looked at in more detail, to determine why they are not as sustainable as they could be and whether, as a result of this Sustainability Appraisal, these policies should be amended or whether there are good reasons for retaining them.

7 Poor Policies in the First Sustainability Appraisal

7.1 There were 9 policies in the First Sustainability Appraisal that were identified as having a negative impact - 'policies which do not fair so well'. This appraisal process has influenced the deletion of policies DD8, E5 and T12 from the Second Deposit Draft, along with other factors.

7.2 Policy E2 has been substantially amended to include a landscape buffer zone to ameliorate the impact of development on the Dartford Marshes and to include better management to help improve the site's critical environmental

capital. In this assessment the resource, energy and waste test has been upgraded to a balanced impact. Furthermore, pollution and natural environment tests have also been upgraded to positive impacts, making the policy as a whole relatively more sustainable than before.

- 7.3 Policy MDS3 has also been amended to retain existing trees and landscape features. In this assessment the resource, energy and waste test has been upgraded to a balanced impact. A minor improvement has also occurred in the balanced category for the natural environment test, reducing the unsustainable aspects of this policy. Furthermore, the advantages such as a new linear park – a Green Grid link – will actually improve the quality of the environment. Although agricultural land and biomass will be lost, utilising this piece of fragmented farmland takes development pressure away from Green Belt land to the south of the A2. The benefits outweigh the disadvantages in this instance.
- 7.4 Policy C14 has remained the same and still has balanced impacts with regard to resource, energy and waste and natural environment. Although development may still be allowed which could materially harm designated sites, adequate compensation or mitigation measures will be required. A blanket approach specifying no development is too restrictive. This policy ensures that a more flexible approach is taken, enabling development whilst protecting the countryside as appropriate. A re-evaluation identified that this policy is sustainable enough not to warrant further amendment.
- 7.5 Policy T2 has remained the same. However, a re-evaluation identified this policy to be more sustainable than originally assessed. The negative impact with regard to the natural environment has been changed to a balanced impact. The policy merely safeguards the land until the CTRL works are complete, then land for development can be assessed against all other relevant policies in the Plan. Given that the CTRL is a transport scheme of national importance and that the Secretary of State's direction has imposed safeguarding on the surrounding land, the Council does not have a choice in its location and some biomass and agricultural land will inevitably be lost. Furthermore, given the improvements to rail transport that will be gained and the regenerative effects it will have on nearby new development, both in terms of the economy, employment and housing, the positive benefits of CTRL outweigh the negative impacts.
- 7.6 Policy R5 has been amended to give a degree of control to drive-through restaurants as well as take-away shops. This amendment however, does not result in any change regarding the sustainability impact of this policy. This policy still has negative impacts with regard to transport energy efficiency and resource, energy and waste. Due to the nature of take-away and drive through-restaurants, there will always be traffic generated for such developments which in turn will increase fuel consumption. Take-away cartons encourage waste and litter. However, such facilities are important to the local community and help to diversify the local economy. The policy also ensures that traffic generation does not adversely affect the amenity of the local area or the surrounding properties and ensures that adequate car parking and highway access is provided. Therefore, on balance, there is very little that could be done to make this policy more sustainable.
- 7.7 Policy TC7 has remained the same, with negative impacts occurring in the transport energy efficiency and living accommodation tests as redevelopment

of Highfield Road for A2 and B1 business uses will result in the loss of residential accommodation. The site is located beyond the edge of the town centre, which will generate more car borne traffic than if the development were located more centrally. However, the scale and mass of development will be compatible with its surroundings. The benefits to be accrued from redevelopment such as improving the natural and urban environments outweigh the negative impacts. No further amendment is proposed.

8 Amended Policies Getting Worse or Less Sustainable

- 8.1 Parts of some policies have actually become worse, they have been either:
- allocated a category which is less sustainable than before ▼▼;
 - contain at least one criteria that is getting slightly worse ▼;
- However, to balance this out, other criteria tests within the same policy are actually getting better or they have been allocated a category which is more sustainable than before. On the whole, as the policy becomes worse and better at the same time, they cancel each other out. The policy therefore remains the same in terms of sustainability or in some cases has become more sustainable. This has happened to policies DD2, DD4, DD6, GB2, GB8, GB9, R1, R2, LRT5, NR7 and MDS7. As the overall impact remains favourable, there is no need to make amendments to these policies.
- 8.2 During the evaluation process, policy H19 had a negative impact for access to open space. As a result, this policy has now been amended in the Second Deposit Draft by including a reference in the supporting text (at paragraph 3.19.2) that policy H8 and Appendix 1a applies to all types of residential development including special needs accommodation. In addition, other policies in the Plan, namely DD5, DD6, LRT11, LRT12 and LRT13 also ensure adequate public open space is provided. As this policy has been amended, it is now more sustainable than before. The category in Appendix 3 has been subsequently upgraded to a balanced impact to show the current position.
- 8.3 Policy E1 has actually become less sustainable. The criteria tests resource, energy and waste, pollution and the natural environment have a slight worsening effect and the transport energy efficiency has been allocated a less sustainable category than before, changing from a positive impact in the First Sustainability Appraisal to a balanced one in this assessment. The policy however still remains sustainable overall. In the event that further employment development is necessary to enable the economy to grow and diversify, in order to provide more local employment opportunities and to help keep the growth in housing and employment in balance, there would be no merit in limiting employment development to ensure this policy becomes more sustainable. It is more a case of ensuring that efficient public transport schemes are implemented to encourage more journeys to work to be made by non-car modes of transport.
- 8.4 Policy E3 has also become less sustainable in the fact that the transport energy efficiency used to be allocated a positive impact in the First Sustainability Appraisal but now is allocated a balanced impact in this assessment. In addition, the resource, energy and waste test has a balanced impact which has become slightly worse. The policy now allows B8 use at Crossways (reflecting the extant planning permission), which in turn could increase traffic and increase fossil fuel consumption. However, B8 use is

seen to be an important part of the local economy and should not be restricted arbitrarily in order to make a policy more sustainable.

- 8.5 Policy E4 has generally become better or more sustainable with regard to 5 of the criteria. However, Darenth Road scores a negative impact with regard to the pollution criteria test. It may generate neighbour nuisance, especially in relation to residential uses. Although there may be a potential conflict between the two land uses, the layout of the site can be designed to mitigate against the impact of noise and pollution. Furthermore, allowing for mixed-use development on-site will be more sustainable. In this instance it is also seen as necessary to allow residential development on-site to enable the commercial element of the site to be viable. No change will be necessary.
- 8.6 Policy T3 also has become better or more sustainable in 3 of the criteria. It does, however, score a negative impact with regard to the natural environment criteria test. The reason for this being that the new road A2 Bean-Cobham Phase Two will cut through a small part of the Green Belt. Despite the loss in the natural environment and agricultural land, this road scheme is likely to reduce congestion and will help to encourage further economic growth and will actually improve the existing urban environment. This road scheme will help facilitate the development of some of the Major Development Sites including Eastern Quarry and Ebbsfleet as well as providing better access to the surrounding wider area. The benefits of this scheme outweigh the loss, and the policy should be retained unchanged.

9 Conclusion

- 9.1 To reiterate, all new and replacement policies have enhanced the sustainability of the Plan and provide better control against a range of development and land uses.
- 9.2 This Sustainability Appraisal has re-assessed 9 policies in the First Deposit Draft which were allocated as being 'poor'. As a direct result only 2 of these policies now remain with a negative impact.
- 9.3 Out of the amended policies that have become worse or less sustainable, only 2 policies contain negative impacts. Two other policies have also become worse although they are sustainable overall. One policy has subsequently been amended, to make it more sustainable, as a direct result of this appraisal process.
- 9.4 There will always be some form of impact when development occurs. Many of the negative impacts such as loss of biomass or agricultural land and increased traffic generation cannot be avoided in an area identified in sub-regional guidance for large scale employment and housing development. It is more a case of allocating development away from sensitive areas and encouraging it close to existing centres or major transport networks, to enable the Borough to function efficiently. This is exactly what the Second Deposit Draft seeks to do.
- 9.5 It is not necessary to make further amendments (beyond those already made) to any of the policies within the Second Deposit Draft, to make them more sustainable. However, care will be needed in particular when determining applications which are relevant to policies E4, T3, R5 and TC7 to ensure that the negative impacts can be mitigated to acceptable levels.