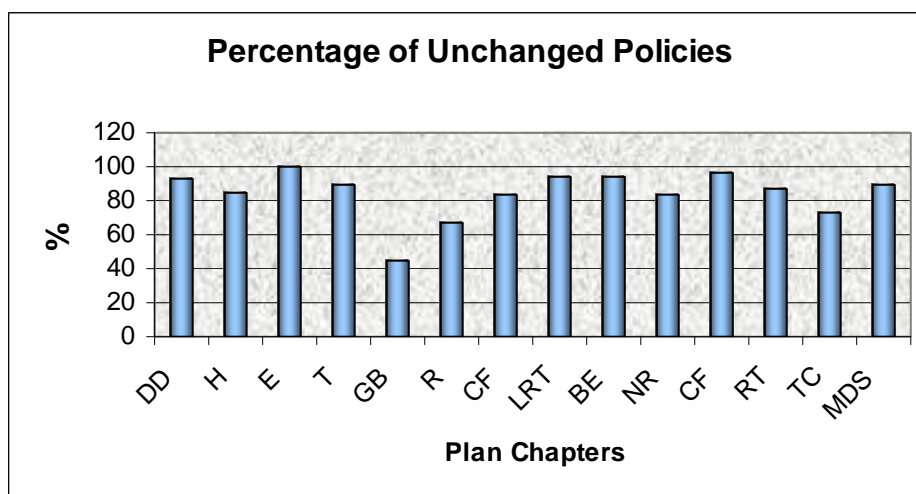


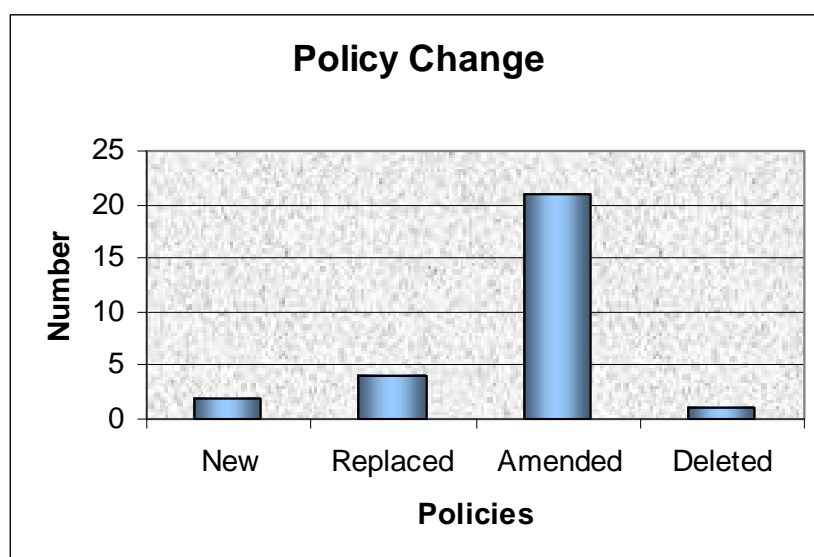
## Appendix 7 Main Findings of Sustainability Appraisal at Proposed Amendments Stage

### 10 Initial findings

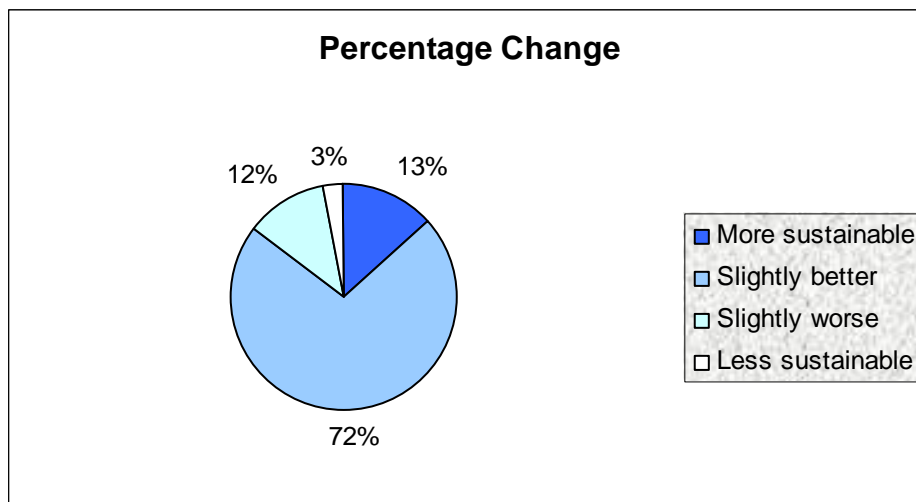
10.1 This appendix sets out the main findings of this revised Sustainability Appraisal at Proposed Amendments stage, interpreting the results found in the summary sheet in Appendix 5. The diagram below shows that overall 86% of the policies have remained unchanged, with the majority of change occurring in the Housing, Green Belt, Retailing, Natural Resources and Town Centre chapters of the Plan. Overall this equates to only 14% of the Plan's policies being changed at Proposed Amendments Stage.



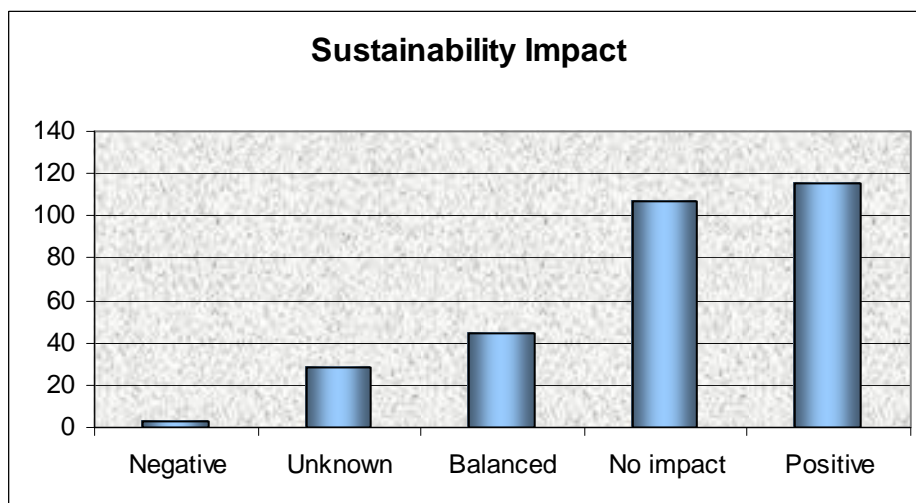
10.2 The diagram below shows that out of the 14% of the policies that have changed at Proposed Amendments Stage - there have only been 2 new policies, 5 replacement policies and 1 deleted policy. The majority of the change has taken place as amendments to existing policies.



10.3 As can be seen from the next diagram, 85% of the policies that have been part of the Proposed Amendments are getting better or more sustainable, with only 15% getting worse or less sustainable.



10.4 The next diagram shows that in the 11 criteria assessed for each policy at Proposed Amendments Stage, the majority are categorised as no impact or positive impact. Overall, only 1% of the whole criteria tests contain negative impacts in 3 policies.



10.5 Using this initial assessment as a starting point, it will be useful to take a more detailed look at each of the changed policies.

**11 New Policies**

11.1 Two new policies GB11 and TC11 have been introduced as part of the Proposed Amendments to the Second Deposit Draft. Policy GB11 contains positive, balanced, unknown or no impacts within the criteria tests and can therefore be generally viewed as having a neutral impact on the sustainability of the Plan overall.

- 11.2 Policy TC11 contains a mix of positive, balanced and unknown impacts. It also contains one negative impact against the category of cultural heritage but there are other sustainability arguments why this policy should remain in the Plan, namely:

TC11 - the regeneration scheme will knock down some of the buildings in Lowfield Street and affect the setting of some of the remaining buildings within the Dartford Town Centre Conservation Area. Although a loss of cultural heritage is inevitable in such a large scale regeneration project, mitigation measures can be used to reduce the impact on the surrounding environment. In addition, the policy requires the design of the new buildings to be of high quality. Pedestrianisation of Lowfield Street will also have a positive impact on the town centre's quality and more shoppers will be attracted into the town, enhancing the town centre's viability and vitality. It can therefore be viewed that overall policy TC11 will be beneficial to the town centre, enough to offset the negative impact on the cultural environment.

- 11.3 As a result of the consultation process at Proposed Amendments stage, policy TC11 was further amended in April 2004. This change means that the balanced impacts occurring for natural environment and access to open spaces criteria have become slightly more sustainable than before.

## **12 Replacement Policies**

- 12.1 There are five replacement policies, three of which relate to air quality, one which relates to Special Landscape Areas and one which relates to retail and the sequential approach. Policy C6 has now been re-introduced word for word as it appeared in the First Deposit Draft, after being removed at Second Deposit Stage. Policy C6 is viewed as being sustainable as it contains only positive and no impacts. New wording has been drawn up for policies R1, NR10, NR11 and NR12 and these policies are viewed as being sustainable in the light that they only contain positive, unknown and no impacts.

## **13 Deleted Policies**

- 13.1 Even though policy TC3 Southern Edge-of-Centre was assessed at Second Deposit Stage as being sustainable as it did not contain any negative impacts, it has now been deleted as part of the Proposed Amendments to the Second Deposit Draft. This is viewed as a rationalisation of the policy approach, given new policy TC11 Lowfield Street which will also allow retail development in this part of the town centre. The effect of removing TC3 from the Plan at this stage is therefore minimal as it does not impact on the sustainability of the Plan.

## **14 Amended Policies Becoming Slightly Better or More Sustainable**

- 14.1 Parts of some policies have actually become better, they have been either:
- allocated a category which is more sustainable than before ▲▲;
  - contain at least one criteria that is getting slightly better ▲.
- As part of the Proposed Amendments to the Second Deposit Draft, policies H1, T7 and GB10 have become more sustainable. Policies DD1, H16, H18, LRT1, BE11, NR6, RT1 and TC10 have become slightly better. Each of these policies can be viewed as being sustainable and make the Plan, as a whole, generally more sustainable than before.

## 15 Amended Policies Becoming Slightly Worse or Less Sustainable

- 15.1 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 H2d, GB4, GB5, GB7, R1 and R2. As the overall impact remains favourable, there is no need to make amendments to these policies.
- 15.2 Policy CF6 has become slightly worse in relation to economic development and community criteria without the policy becoming better in other criteria to offset the impact. However, policy CF6 is still sustainable overall as it does not contain any negative impacts.
- 15.3 Although policy GB9 is becoming less sustainable, with the living accommodation criteria changing from a positive to a negative impact. Nevertheless, it needs to be retained without change because:
- GB9 - there will be a loss of residential development at Oakfield Lane Campus which results in a change from a positive to a negative impact in relation to the category of living accommodation. The retention of school facilities will be of more benefit than the provision of new housing in this location.

## 16 Poor Policies in the First or Second Sustainability Appraisal

- 16.1 There were nine policies in the First Sustainability Appraisal that were identified as having a negative impact - 'policies which do not fare so well' (Poor 1<sup>st</sup> SA), including DD8, E2, E5, T2, T12, R5, C14, TC7 and MDS3. At the Second Deposit Stage, seven of these policies were either deleted (DD8, E5, T12), amended (E2, MDS3), found to be more sustainable than the original assessment (T2, C14) or found to have benefits that outweigh the disadvantages. Currently at this stage, only policies R5 and TC7 still remain with negative impacts.
- 16.2 Five more policies were identified in the revised Sustainability Appraisal at Second Deposit Stage as not faring so well (Poor 2<sup>nd</sup> SA) or becoming less sustainable, including H19, E1, E3, E4 and T3. Out of these, only policies E4 and T3 still remain with negative impacts at this stage.
- 16.3 There are good reasons why the four least sustainable policies (identified as poor in previous Sustainability Appraisal assessments) should remain unchanged in the Plan, namely:
- E4 – the negative impacts of noise and air pollution from the Darent Road site on residential properties can be mitigated by good layout and design. The policy needs to remain unchanged so that the residential element of the scheme can enable the commercial element of the site to be viable;

T3 – the negative impact of loss of land in the Green Belt (new road A2 Bean-Cobham Phase Two) is outweighed by other benefits such as reducing congestion, encourage economic growth and facilitate development of the Major Development Sites;

R5 – there are negative impacts relating to take-away and drive-through restaurants such as traffic generation and litter. Nevertheless the policy provides for a valuable community service and helps the economy to diversify whilst ensuring traffic generation does not adversely impact on the amenity of the surrounding area by ensuring adequate car parking and highway access;

TC7 – the redevelopment of Highfield Road for A2 and B1 uses will result in the loss of residential accommodation. The benefits accrued from this redevelopment scheme will improve the urban environment and the town centre's performance, which outweighs the negative impacts.

## **17 Conclusion**

- 17.1 To reiterate, the majority of the Proposed Amendments to the Second Deposit Draft (January 2004) have enhanced the sustainability of the Plan. A small enhancement to the sustainability of the Plan has also occurred at Proposed Amendments Stage (April 2004). Nevertheless, there will always be some form of impact when development occurs. Many of the negative impacts such as loss of cultural heritage or loss of residential accommodation from particular sites cannot be avoided in an area identified in sub-regional guidance for large scale employment and housing development as well as major regeneration. 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 Local Plan Review is striving to achieve.
- 17.2 The Sustainability Appraisals undertaken as part of the Plan's preparation have identified a total of 17 policies throughout the various stages of the Plan as being 'poor'. Only six of these policies now remain with negative impacts. It is not necessary to make further amendments to any of the policies within the Plan, to make them more sustainable, as there are good reasons for retaining them unchanged. However, care will be needed in particular when determining applications which are relevant to policies E4, T3, GB9, R5, TC7 and TC11 to ensure that the negative impacts can be mitigated to acceptable levels. These policies will also need to be reassessed at a later date, if they are to be incorporated into the new style Local Development Framework.