



Canterbury City Council

Sustainability Appraisal of the Canterbury District Local Plan

Post Adoption Statement



July 2017

Amec Foster Wheeler Environment
& Infrastructure UK Limited



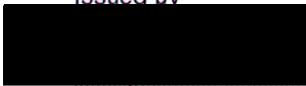
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Doc Ref. 37340iir

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Document revisions

No.	Details	Date
1	Draft Post Adoption Statement	06.06.17
2	Final Post Adoption Statement	14.07.17



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Appendix A Monitoring Framework

1. Introduction

1.1 Background

Canterbury City Council (the Council) submitted the Canterbury District Local Plan: Publication Draft (June 2014)¹ (the Publication Draft Local Plan) to the Planning Inspectorate on 21st November 2014, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012². Following Examination in Public (EiP) which commenced in July 2015 (and including consultation on Proposed Amendments³ and Main Modifications⁴ to the Local Plan), the Local Plan was found sound by the Inspector in his report⁵ dated 15th June 2017. The Canterbury District Local Plan⁶ (hereafter referred to as the 'Local Plan') was subsequently adopted by the Council on 13th July 2017.

Amec Foster Wheeler Environment and Infrastructure UK Limited (Amec Foster Wheeler) was commissioned by the Council to undertake a Sustainability Appraisal (SA), incorporating Strategic Environment Assessment (SEA), of the Local Plan. This Post Adoption Statement is the final output of the SA process. It describes the way in which the Council has taken environmental and sustainability considerations and the views of consultees into account in the adopted Local Plan and fulfils the plan and programme adoption requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive)⁷ and the Environmental Assessment of Plans and Programmes Regulations 2004⁸.

1.2 The Canterbury District Local Plan

The Local Plan sets out the vision for Canterbury District up to 2031 and provides the spatial planning response to the challenge of growth. It has been developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement. The Local Plan comprises of the following core components:

- ▶ Vision and Plan Objectives;
- ▶ Strategic Policies (relating to the quantum, distribution and location of growth);
- ▶ Thematic Policies; and
- ▶ Site Allocations.

Overall, the Local Plan makes provision for a total of 16,000 dwellings and 96,775 sqm of employment land to be provided over the plan period. This growth is to be focused at Canterbury with smaller scale growth at Herne Bay, Whitstable and in larger villages across 12 strategic sites (identified in Policy SP3), nine additional housing sites (Policy HD1) and eight employment sites (Policy EMP1).

Work on the Local Plan began in 2007 and has involved ongoing consultation leading up to its submission and adoption. The first formal stage of consultation took place in January 2010 on a Core Strategy Options

¹ Canterbury City Council (2014) *Canterbury District Local Plan Publication Draft 2014*. Available from <https://www.canterbury.gov.uk/media/941559/CDLP-11-Canterbury-District-Local-Plan-Publication-Draft-June-2014-with-maps-CCC.pdf> [Accessed June 2017].

² SI 2012 No. 767T *the Town and Country Planning (Local Planning) (England) Regulations 2012*.

³ Canterbury City Council (2015) *Canterbury District Local Plan Publication Draft – Proposed Amendments*. Available from <https://www.canterbury.gov.uk/media/1094153/CDLP-181Proposed-amendments-November-2015-Report.pdf> [Accessed June 2017].

⁴ Canterbury City Council (2017) *Proposed Main Modifications to the Canterbury District Local Plan – February 2017*. Available from <https://www.canterbury.gov.uk/media/1431178/Local-Plan-Main-Modifications-February-2017-.pdf> [Accessed June 2017].

⁵ The Planning Inspectorate (2017) *Report on the Examination of the Canterbury District Local Plan*. Available from <https://www.canterbury.gov.uk/media/1497772/Inspectors-Report-June-2017.pdf> [Accessed June 2017].

⁶ Canterbury City Council (2017) *Canterbury District Local Plan 2017*, <https://www.canterbury.gov.uk/adopted-docs>

⁷ Available from <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN> [Accessed June 2017].

⁸ SI 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*.

Report⁹ and was followed by the publication of the Preferred Option Consultation Draft Local Plan¹⁰ in June 2013. The Publication Draft Local Plan was subsequently issued for consultation from 5th June 2014 to 18th July 2014 prior to its submission to the Planning Inspectorate for examination.

The EiP commenced in July 2015 with Stage 1 Hearings taking place between 14th July and 29th July 2015. Stage 1 of the EiP closed at the end of July 2015 and the Planning Inspector then wrote to the Council on 10th August 2015 with his initial findings and comments¹¹. In his letter, the Inspector asked the Council to increase the housing numbers required for the area and to identify sufficient sites to ensure that the District has a 5 year housing land supply. This required amendments to the Publication Draft Local Plan. Consultation on the Canterbury District Local Plan Publication Draft – Proposed Amendments (November 2015)³ subsequently began on the 27th November 2015 and ended on 22nd January 2016. Stage 2 Hearings of the EiP then took place between 19th July 2016 and the 21st July 2016; housing supply and housing allocations were considered at these hearings. A final set of hearings took place between 13th September and 22nd September 2016 to discuss remaining matters; these included infrastructure and delivery.

Following the hearings' conclusion, the Council produced a document setting out proposed modifications to the Publication Draft Local Plan identified over the course of the EiP and this was sent to the Inspector on the 25th November 2016.¹² On 15th December 2016, the Inspector wrote to the Council setting out the Main Modifications he considered necessary to make the Local Plan sound.¹³ The Council subsequently consulted on the Proposed Main Modifications to the Local Plan⁴ for a six week period commencing 10th February 2017.

On 15th June 2017, the Council received the Inspector's Report⁵. In his report, the Inspector concluded that, with the recommended main modifications, the Local Plan was sound. The Local Plan, amended to include the Main Modifications contained in the Inspector's Report, was subsequently adopted by the Council on 13th July 2017.

Further information relating to the adopted Local Plan is available via the Council's website:

<https://www.canterbury.gov.uk/adopted-docs>.

1.3 Sustainability Appraisal

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, local planning authorities are required to carry out a SA of their local plans in order to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive⁷, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)⁸.

The SEA Directive and transposing regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is "to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

⁹ Canterbury City Council (2010) *Canterbury District Local Development Framework – Core Strategy Options Report for consultation*. Available from <https://www.canterbury.gov.uk/media/941672/CDLP-21-Core-Strategy-Options-Report-Jan-2010-CCC.pdf> [Accessed November 2015].

¹⁰ Canterbury City Council (2013) *Canterbury District Local Plan Preferred Option Consultation Draft June 2013*. Available from <https://www.canterbury.gov.uk/media/941567/CDLP-12-Canterbury-District-Local-Plan-Preferred-Option-Draft-June-2013-with-maps-CCC.pdf> [Accessed June 2017].

¹¹ Letter of the Inspector (Mike J Moore) to Canterbury City Council dated 10th August 2015 concerning the Main outcomes of Stage 1 Hearings. Available from <https://www.canterbury.gov.uk/planning/planning-policy/local-plan/> [Accessed June 2017].

¹² Canterbury City Council (November 2016) *Local Plan Main Modifications* <https://www.canterbury.gov.uk/media/1395258/Local-Plan-Main-Mods-251116.docx>

¹³ Letter of the Inspector (Mike J Moore) to K Britton, Canterbury City Council dated 15th December 2016 <https://www.canterbury.gov.uk/media/1395274/letter-to-CCC-from-Inspector-re-MM-15-Dec-16.docx>

At paragraphs 150-151, the National Planning Policy Framework (NPPF)¹⁴ sets out that local plans are key to delivering sustainable development and that they must be prepared with the objective of contributing to the achievement of sustainable development. Paragraph 165 reiterates the requirement for SA/SEA as it relates to local plan preparation:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

The National Planning Practice Guidance¹⁵ also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives.

In this context, SA has played an integral role in the development of the Local Plan with each main stage of the Plan’s preparation having been accompanied by a SA Report, prepared to meet the reporting requirements of the SEA Directive and SEA Regulations (see **Section 3** for further information).

To ensure that the final, adopted Local Plan has taken into account sustainability considerations, and to meet the Council’s responsibilities under the SEA Directive, omission housing sites, omission employment sites and the Proposed Amendments to the Local Plan and Main Modifications have been subject to SA since the Plan was submitted for examination.

The SA work undertaken in support of the Local Plan can be viewed on the Council’s website: <https://www.canterbury.gov.uk/planning/local-plan/emerging-local-plan/examination-documents/>. A comprehensive overview of the relationship between the development of the Local Plan and the SA process is contained in Amec Foster Wheeler’s response to the Inspector’s pre-hearing questions¹⁶.

1.4 Purpose of this Post Adoption Statement

This Post Adoption Statement represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Directive and SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- ▶ how environmental and sustainability considerations have been integrated into the Local Plan (**Section 2** of this document);
- ▶ how the SA Reports have been taken into account (**Section 3**);
- ▶ how opinions expressed in response to the consultation on the SA Reports have been taken into account (**Section 4**);
- ▶ the reasons for choosing the Local Plan, as adopted, in the light of the other reasonable alternatives dealt with (**Section 5**); and
- ▶ the measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Local Plan (**Section 6**).

¹⁴ Department for Communities and Local Government (2012) *National Planning Policy Framework*. Available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Accessed June 2017].

¹⁵ Department for Communities and Local Government (2015) *Planning Practice Guidance*. Available from <http://planningguidance.planningportal.gov.uk/> [Accessed June 2017].

¹⁶ Amec Foster Wheeler (2015) *Sustainability Appraisal of Canterbury Local Plan: Response to Inspector’s Pre-hearing Questions*. Available from <https://www.canterbury.gov.uk/media/1008160/16903-26-Pre-Hearing-SA-Technical-Note-for-Inspector.pdf> [Accessed June 2017].

2. How Environmental and Sustainability Considerations Have Been Integrated into the Local Plan

2.1 Environmental and Sustainability Considerations in the Local Plan

Preparation of the Local Plan

Environmental and wider sustainability considerations have been integral to the key decisions made in respect of the policies and proposals of the Local Plan. The integration of these considerations into the plan making process has principally been achieved through:

- ▶ the development of a comprehensive evidence base on topics including (inter alia) housing, employment, retail, transport, landscape, biodiversity, flood risk, climate change and health;
- ▶ continuous engagement with key stakeholders and the public on the emerging Local Plan and related environmental and sustainability matters;
- ▶ the consideration of national planning policy and the objectives of other plans and programmes;
- ▶ fulfilment of the Council's Duty to Cooperate; and
- ▶ ongoing assessment including SA (see **Section 2.2**) as well as Habitats Regulations Assessment (HRA)¹⁷.

Local Plan Content

In accordance with the NPPF, the delivery of sustainable development underpins the Local Plan. This aim is expressed in the Local Plan Vision, which seeks to achieve “*focused, well-planned and environmentally sustainable growth*”, as well as through the four Plan Objectives:

- ▶ To strengthen and broaden the local economy.
- ▶ To provide sufficient housing to meet local housing need and support economic growth.
- ▶ To protect the built and natural environment.
- ▶ To develop sustainable communities, and seek to ensure that adequate community facilities are provided.

The policies and proposals of the Local Plan will support the delivery of the Vision and Objectives and help to deliver sustainable development. For example, the strategic policies contained in Chapter 1 of the Local Plan specifically promote sustainable development (Policy SP1), an appropriate scale and location of new development (Policies SP2 to SP4), the delivery of supporting infrastructure (Policy SP6 and the avoidance of adverse effects on the integrity of European designated nature conservation sites (Policy SP6). In this regard, the SA of the Publication Draft Local Plan¹⁶ concludes that development and growth associated with the implementation of the Local Plan will help to deliver housing, employment and associated services and facilities to meet local needs. The SA Report notes that whilst adverse environmental effects (such as increased pressure on natural resources and the generation of waste) are likely, the Local Plan seeks to deliver the majority of planned growth at strategic sites, the selection of which has in general avoided more

¹⁷ Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the ‘Habitats Regulations’) requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any ‘likely significant effects’ on any European site as a result of the plan’s implementation (either alone or ‘in combination’ with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site’s integrity with reference to the site’s conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as ‘Habitats Regulations Assessment’.

environmentally sensitive location, and that the policies of the Local Plan seek to manage adverse effects arising from new development.

2.2 Environmental and Sustainability Considerations in the SA

To provide the context for the SA, and in compliance with the SEA Directive, a review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment and its evolution without the Local Plan were considered; together, they informed the identification of a series of key sustainability issues. This information was initially set out in the 2010 Scoping Report¹⁸ and was subsequently updated as part of the 2014 SA Report to reflect changes since the Scoping Report was published.

The key sustainability issues identified through the review of plans and programmes and analysis of baseline information informed, and were reflected in, the objectives and guide questions that comprised the framework used to appraise the Local Plan (the SA Framework) (see **Table 2.1**). Broadly, the SA objectives presented the preferred sustainability outcome which usually involved minimising detrimental effects and enhancing positive effects.

Table 2.1 SA Framework

SA Objective	Key questions/guidance	SEA Dir. Topic
Sustainable innovative and productive economy that delivers high levels of employment		
1. Economy and Employment To achieve a strong and stable economy which offers rewarding and well located employment opportunities to everyone.	1.1 Will it improve efficiency, competitiveness, vitality and adaptability of the local economy? 1.2 Will it encourage investment in businesses, people and infrastructure for the long term? 1.3 Will it increase the number of businesses in the District? 1.4 Will it help diversify the economy? 1.5 Will it lead to an increase in the local skill base through recruitment from Canterbury's Higher education establishments? 1.6 Will it help to foster growth in the knowledge based economy? 1.7 Will it promote sustainable tourism? 1.8 Will it meet the employment needs of local people? 1.9 Will it improve physical access to jobs through improved location of sites and proximity to transport links?	Material assets
2. Rural/Coastal Communities To sustain vibrant rural and coastal communities.	2.1 Will it assist with the diversification of the rural/coastal economy? 2.2 Will it support and encourage the growth of rural/coastal businesses? 2.3 Will it retain village/coastal services and local trading schemes? 2.4 Will it assist in the provision of affordable houses in rural/coastal areas?	N/A
Protect and enhance the physical and natural environment		
3. Water Quality To protect and improve the quality of inland and coastal waters.	3.1 Will it minimise the adverse effects on ground and/or surface water quality? 3.2 Will it avoid adverse impacts on coastal waters, fisheries and bathing waters? 3.3 Will it protect and improve ground and surface water quality?	Water
4. Transport Reduce road traffic and its impacts, promoting more	4.1 Will it reduce travel demand? 4.2 Will it improve transport of goods/people by more sustainable means? 4.3 Will it encourage walking, cycling and use of public transport? 4.4 Will it help to reduce traffic congestion and improve road safety?	Air, Climatic factors

¹⁸ Canterbury City Council (2010) *Sustainability Appraisal of the LDF: Agreed Scope of the Sustainability Appraisal (following consultation on the Scoping Report)*, Entec UK Ltd, London.

SA Objective	Key questions/guidance	SEA Dir. Topic
sustainable modes of transport.	4.5 Will it reduce the need to travel?	
5. Countryside and Historic Environment To protect and improve landscapes for both people and wildlife and to protect and maintain vulnerable assets (including built and historic).	5.1 Will it improve access to the countryside and open space? 5.2 Will it avoid adverse impacts and enhance designated and non-designated landscape features? 5.3 Will it protect and enhance Green Infrastructure throughout the district? 5.4 Will it improve access to urban open space? 5.5 Will it help to protect and enhance sites, areas and features of historic, cultural archaeological and architectural interest? 5.6 Will it help to conserve historic buildings, places and spaces that enhance local distinctiveness, character and appearance through sensitive adaptation and re-use? 5.7 Will it improve and promote access to buildings and landscapes of historic/cultural value?	Landscape, Cultural Heritage Including Architectural and Archaeological Heritage, Soil
6. Geology and Biodiversity To avoid damage to geological sites and improve biodiversity.	6.1 Will it avoid damage to and enhance species and habitats? 6.2 Will it minimise habitat fragmentation? 6.3 Will it provide opportunities for new habitat creation or restoration and link existing habitats as part of the development process? 6.4 Will it ensure the sustainable management of natural habitats? 6.5 Will it avoid damage to and protect geologically important sites?	Biodiversity, Flora & Fauna
7. Climate Change, Energy and Air Quality To reduce the causes and impacts of climate change, improve air quality and promote energy efficiency.	7.1 Will it reduce vulnerability to climate change? 7.2 Will it reduce or minimise greenhouse gas emissions? 7.3 Will it maintain and improve local air quality? 7.4 Will it minimise the need for energy? 7.5 Will it increase efficiency in the use of energy? 7.6 Will it help to increase the share of energy generated from renewable sources?	Air, Climatic factors
8. Flood Risk and Coastal Erosion To reduce the risk of flooding and coastal erosion which would be detrimental to the public well-being, the economy and the environment.	8.1 Will it help to minimise the risk of flooding to existing and new developments/infrastructure? 8.2 Will it help to discourage inappropriate development in areas at risk from flooding and coastal erosion? 8.3 Will it help to manage and reduce the risks associated with coastal erosion? 8.4 Will it reduce vulnerability to flooding and coastal erosion?	Climatic factors, Water
Just society that promotes social inclusion, sustainable communities and personal wellbeing		
9. Access to Services Share access to services and benefits to prosperity fairly.	9.1 Will it improve social and environmental conditions in the most deprived areas? 9.2 Will it increase economic activity? 9.3 Will it improve access to skills and training for raising employment potential? 9.4 Will it help to provide more equal access to opportunities, services and facilities (e.g. sport, culture, health, education, open space etc.)?	Human health, Population
10. Sustainable Living and Revitalisation To revitalise town and rural centres and to promote sustainable living.	10.1 Will it improve townscapes/rural centres and physical assets? 10.2 Will it encourage more people to live in town centres? 10.3 Will it improve provision of shops or services within town centre? 10.4 Will it promote responsible tourism which is both ecologically and culturally sensitive? 10.5 Will it improve physical access to services, such as a GP, a hospital, schools, areas of employment and retail centres?	Population, Human health, material assets

SA Objective	Key questions/guidance	SEA Dir. Topic
11. High Quality Design and Sustainability To encourage sustainable design and practice.	11.1 Will it use architectural design to enhance the local distinctiveness of development? 11.2 Will it improve the quality of the built environment through high standards of sustainable design and construction of new and existing buildings? 11.3 Will it minimise light and noise pollution?	Material assets, Landscape, Cultural heritage
12. Housing To make suitable housing available and affordable to everyone.	12.1 Will it encourage more access to affordable housing? 12.2 Will it encourage access to decent housing? 12.3 Will it provide an appropriate mix of housing to meet residents' needs and aspiration and create balanced communities? 12.4 Will it reduce the number of unfit and empty homes? 12.5 Will it reduce the number of empty homes? 12.6 Will it reduce the level of homelessness in the District?	Population, Human health
13. Quality of Life To improve the quality of life for those living and working in the District.	13.1 Will it reduce actual levels of crime? 13.2 Will it reduce the fear of crime? 13.3 Will it reduce death rates and negative health impacts in key vulnerable groups? 13.4 Will it promote healthy lifestyles? 13.5 Will it improve peoples' perception of their local area being a place where people from different ethnic backgrounds get on well together? 13.6 Will it promote sport and physical activity?	Population, Human health
Use resources as efficiently as possible		
14. Use of Land To deliver more sustainable use of land in more sustainable location patterns.	14.1 Will it promote the wise use of land (minimise development on greenfield land)? 14.2 Will it reduce the amount of derelict, degraded & underused land? 14.3 Will it reduce land contamination? 14.4 Will it promote the use of previously developed land? 14.5 Will it encourage urban renaissance?	Soil, Material Assets, Landscape
15. Natural Resources To ensure the prudent use of natural resources and the sustainable management of existing resources.	15.1 Will it minimise the demand for raw materials? 15.2 Will it promote the use of local resources? 15.3 Will it reduce minerals extracted and imported? 15.4 Will it increase efficiency in the use of raw materials and promote recycling? 15.5 Will it minimise the use of water and increase efficiency in water use? 15.6 Will it protect water resources? 15.7 Will it encourage farming practices sensitive to the character of the countryside?	Material Assets, Soil
16. Waste To reduce generation and disposal of waste, and achieve sustainable management of waste.	16.1 Will it reduce the amount of waste generated? 16.2 Will it encourage the recycling of waste? 16.3 Will it increase the demand for recycled materials? 16.4 Will it ensure the management of wastes consistent with the waste management hierarchy?	Material Assets

The SA process considered the contribution of the Local Plan towards each of the appraisal objectives, drawing on the baseline information to predict the likely significant effects in line with the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the SEA Directive¹⁹. Specifically, the following key components of the Local Plan were appraised against the SA objectives:

- ▶ Vision and Plan Objectives;

¹⁹ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Published September 2005.

- ▶ the Preferred Development Option in terms of the amount of growth to be delivered over the plan period, its broad distributed across Canterbury District and the preferred configuration of site allocations to deliver the spatial strategy (including reasonable alternatives); and
- ▶ plan policies.

The appraisal identified the likely changes to the baseline conditions as a result of the Local Plan's implementation. These effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. Secondary, synergistic and cumulative effects were also considered.

3. How the SA Report Has Been Taken into Account

3.1 Overview

As set out in **Section 1.3**, the development of the Local Plan has been iterative. SA has played an integral role in this iterative process with each of the following Local Plan stages having been accompanied by a SA Report in order to help inform the Plan and fully integrate environmental and sustainability considerations into decision making:

- ▶ Core Strategy Options Report (January 2010)¹⁸;
- ▶ Development Requirements Study (June 2012)²⁰;
- ▶ Strategic Housing Land Availability Assessment (SHLAA) (October 2012)²¹;
- ▶ Preferred Option Consultation Draft Local Plan (May 2013)²²;
- ▶ Publication Draft Local Plan (June 2014)^{Error! Bookmark not defined.};
- ▶ Proposed Amendments (November 2015)¹⁶;
- ▶ Omission Employment Sites (June 2016)²³;
- ▶ Omission Housing Sites (June 2016)²⁴;
- ▶ Main Modifications (February 2017)²⁵.

Table 3.1 presents a summary of the key stages in the development of the Local Plan, the associated SA work undertaken and the key conclusions of the appraisal.

Table 3.1 Summary of the SA and Links to the Development of the Local Plan

Local Plan Stage	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
Core Strategy Options Report (January 2010)	<p>The SA Report included an appraisal of:</p> <ul style="list-style-type: none"> • the compatibility of the emerging Local Plan Vision and Objectives with the SA objectives; • nine potential development options concerning the future distribution of growth in addition to a preferred consultation option; and 	<p>The SA Report concluded that the consultation option was an approach which had the opportunity to build on the more sustainable aspects of the nine development options initially considered and subject to appraisal. The Report also stated that the consultation option provided more of a focus on the areas to the south of Canterbury for larger scale developments where better transport links exist and</p>

²⁰ AMEC (2012) *Sustainability Appraisal of Development Scenarios, Technical Note, June 2012*. Available from <https://www.canterbury.gov.uk/media/941615/CDLP-18-SA-Technical-Note-on-Development-Scenarios-2012-AMEC.pdf> [Accessed June 2017].

²¹ AMEC (2012) *Sustainability Appraisal of Strategic Housing Land Availability Assessment: Technical Note*. Available from <https://www.canterbury.gov.uk/media/1033797/Sustainability-Appraisal-of-SHLAA-Main-Report-2012.pdf> [Accessed June 2017].

²² AMEC (2013) *Sustainability Appraisal of the Draft Local Plan*. Available from <https://www.canterbury.gov.uk/media/942200/CDLP-107-Sustainability-Appraisal-CDLP-Preferred-Option-Amec-May2013.pdf> [Accessed June 2017].

²³ Amec Foster Wheeler (2016) *Addendum to the Sustainability Appraisal Report of the Canterbury District Local Plan Publication Draft: Appraisal of Omission Employment Sites*. Available from https://www.canterbury.gov.uk/media/1219164/FINAL-SA-Report-Additional-Employment-Site-Addendum-290616_FINAL.pdf [Accessed June 2017].

²⁴ Amec Foster Wheeler (2016) *Addendum to the Sustainability Appraisal Report of the Canterbury District Local Plan Publication Draft: Appraisal of Omission Housing Sites*. Available from https://www.canterbury.gov.uk/media/1219479/37340-Omission-Housing-Sites-SA-Report_JUNE-FINAL.pdf [Accessed June 2017].

²⁵ Amec Foster Wheeler (2017) *Addendum to the Sustainability Appraisal Report of the Canterbury District Local Plan Publication Draft: Appraisal of Main Modification*. Available from <https://www.canterbury.gov.uk/media/1431465/SA-of-Main-Modifications-Addendum-February-2017.pdf> [Accessed June 2017].

Local Plan Stage	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
	<ul style="list-style-type: none"> outline core policies. 	<p>where there are fewer nationally important sites for wildlife in close proximity.</p> <p>The outline core policies were appraised as having a range of significant and minor positive effects on a number of social, economic and environmental objectives. The SA did not identify any significant negative effects.</p>
Development Requirements Study (June 2012)	The SA Report included an appraisal of ten development scenarios concerning levels of future growth identified in the Development Requirement Study.	The SA Report concluded that Scenario E (Future 'Preferred Scenario') offered the greatest potential to achieve the appropriate balance between the SA objectives (i.e. to optimise growth and minimise detrimental environmental effects). However, in order to minimise potentially significant negative effects, the Report stated that careful consideration would need to be given to the location of proposed development envisaged under the scenario in order to avoid sensitive sites, optimise community benefits and to realise the opportunities for innovative sustainable design (by ensuring efficient use of land and resources).
SHLAA (October 2012)	A total of 181 sites identified through the SHLAA process were appraised with the results presented in a report to the Council.	<p>The report found that sites comprising 35ha of land performed very well against the SA objectives and a further 83.59ha of sites would have more positive than negative effects.</p> <p>The findings of the appraisal helped to inform the Council's selection of site allocations.</p>
Preferred Option Consultation Draft Local Plan (May 2013)	<p>The SA Report included an appraisal of the following key plan components:</p> <ul style="list-style-type: none"> Vision and Plan Objectives; the Preferred Development Option in terms of the quantum and distribution of growth to be accommodated in the District and the site allocations necessary to deliver that growth. Reasonable alternatives relating to the configuration of sites to deliver the overall quantum of growth were also appraised; and Draft Local Plan Policies. 	<p>Regarding the Preferred Development Option, the SA Report concluded:</p> <p><i>"The growth anticipated in the Draft Local Plan clearly builds on early work by the Council and is predominately in line with the development scenario E, outlined in the Development Requirements Study, and which following assessment came to be the Council's preferred option. The housing requirement of 15,600 dwellings in 2011-2031 matches the scenario and recognises the conclusion of the 2012 sustainability appraisal that this offers the greatest potential to optimise growth and minimise detrimental environmental effects."</i></p> <p>In terms of the Local Plan policies, the SA Report concluded that there would be significant positive effects on several of the SA objectives including Economy and Employment, Rural/Coastal Communities, Access to Services, Sustainable Living and Revitalisation, High Quality Design and Housing. Whilst no significant cumulative negative effects were identified, the potential for minor negative effects on some SA objectives were highlighted due to impacts associated with new development.</p>
Publication Draft Local Plan (June 2014)	<p>The SA Report included an appraisal of the following key plan components:</p> <ul style="list-style-type: none"> amended Vision and Plan Objectives; new sites proposed during consultation on the Preferred Option Consultation Draft Local Plan and resulting changes to the configuration of sites that comprise the Preferred Development Option; amended Draft Local Plan Policies. 	The key conclusions of the SA Report reflected those of the Preferred Option Consultation Draft SA Report.

Local Plan Stage	Summary of the Accompanying SA Report (what was appraised)	Key Conclusions
Proposed Amendments (November 2015)	The Addendum to the 2014 SA Report appraised proposed changes to site allocations (including new sites and amendments to existing sites, as well as reasonable alternatives) made in response to the Inspector's request that the Council increase its housing requirement. The resulting Revised Preferred Development Option (in terms of the overall housing requirement, employment land provision and the preferred configuration of sites) was also appraised.	The SA Report concluded that the " <i>range and type of effects associated with the implementation of the revised preferred development option are very similar to the preferred development option contained in the submitted 2014 draft Local Plan. This reflects the fact that the majority of sites that would come forward under both options are the same, focusing the majority of growth in Canterbury, with smaller scale growth at Herne Bay, Whitstable and in larger villages. However, commensurate with the increased scale of development under the revised preferred development option, the expected magnitude of significant positive and significant negative effects are likely to be greater.</i> "
Omission Employment Sites (June 2016)	An appraisal of six omission employment sites identified by the Inspector was undertaken.	Based on the findings of the appraisal of omission employment sites and other evidence, the Council did not revise further the suite of site allocations that comprise the Preferred Development Option.
Omission Housing Sites (June 2016)	An appraisal of nine omission sites submitted during consultation on the Canterbury District Local Plan Publication Draft – Proposed Amendments and a re-appraisal of site SHLAA/041.	Based on the findings of the appraisal of omission housing sites and other evidence, the Council did not revise further the suite of site allocations that comprise the Preferred Development Option.
Main Modifications (February 2017)	This further addendum to the 2014 SA Report appraised the Main Modification to the Local Plan requested by the Inspector. These modifications included an increase in the overall dwelling requirement, changes to site allocations and the consequential changes to the Preferred Development Option, as well as policy modifications.	The SA Report concluded that the amended Preferred Development Option would have a significant positive effect in relation to the economy, housing availability and affordability as well as access to services and rural/coastal communities. However, development of the scale proposed would have likely negative effects on SA objectives relating to, in particular, countryside and the historic environment, geology and biodiversity, sustainable living and land use. Notwithstanding the negative effects identified during the appraisal, the SA Report noted that where there is the potential for adverse effects, these could be mitigated through the application of Local Plan policies and at the planning application stage.

3.2 How the Findings of the SA Have Been Taken into Account

The SA has helped to shape the strategic direction of the Local Plan. In particular, the findings of the SA of the emerging Local Plan and reasonable alternatives have informed the Council's decisions in respect of:

- ▶ the quantum of growth to be accommodated in the District over the plan period;
- ▶ the overall distribution of that growth across the District (the spatial strategy);
- ▶ the sites to be allocated in the Local Plan and their configuration to deliver the overall quantum of growth based on the preferred spatial strategy.

Through the SA, a number of recommendations were also made concerning the emerging plan policies and these were set out in the SA Reports prepared in support of the Preferred Option Consultation Draft Local Plan and Publication Draft Local Plan. The recommendations are summarised in **Table 3.2** together with the Council's response and update in light of the Main Modifications.

Table 3.2 Recommendations Arising from the SA

Recommendation	Council Response or Amendment ²⁶	Update in light of Main Modifications
<p>The strategy for sustainable development referenced in policy SP1 is not defined. Whilst the accompanying text in the preamble of the policy identifies the key elements of a local definition of sustainable development and then goes onto say that the policies and proposals in the Local Plan provide a robust response to aiding the achievement of sustainable development, there is no sustainable development strategy identified (although an Environmental Strategy is referenced earlier in the chapter). It is suggested that if the intention was to ensure that all readers of the plan considered the policies together (and so did not read individual policies in isolation) the wording is amended in the policy to achieve this; however, if the intent was to refer to a sustainable development strategy, further substantiation is needed.</p>	<p>Policy SP1 includes the following: <i>"Where the Council considers that a proposal would directly undermine the strategy for sustainable development set out in this plan, such proposals will not be approved"</i>.</p> <p>The strategy for sustainable development referred to in policy SP1, is the entirety of the Local Plan.</p>	<p>The text that the Council referred to in its response has been deleted. The recommendation is withdrawn as the policy is now written to reflect the approach in the NPPF.</p>
<p>Preferential use of previously developed land/minimising loss of best and most versatile land appears to be missing from Local Plan policies. It is suggested that the Council consider the inclusion of text that addresses NPPF paragraph 111 which states 'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land' and paragraph 112 'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'. This could be addressed under either modification to SP4 (part 5 and replacing the currently unidentified cross reference given to policy EMP**) or to DBE1 (given introduction text (5.7) which begins 'Land is a finite resource...').</p>	<p>Additional text has been inserted after paragraph 1.53 of the draft Local Plan:</p> <p><i>"The NPPF says that planning should "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". The Council was very successful in the previous Local Plan in directing development to previously-developed land, achieving up to 80% development on brownfield land in recent years.</i></p> <p><i>The draft Local Plan, despite needing to allocate land on greenfield sites, still allocates approximately 30% of housing development on previously-developed land. Beyond the sites allocated in the draft Local Plan, the Council will encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on fresh land'.</i></p>	<p>Recommendation addressed.</p>
<p>Need to ensure effects of development on existing waste management infrastructure are considered in development (particularly for sites of scale listed in SP3).</p>	<p>Whilst no changes have been made to Policy SP3 itself, the amendment to DB6, in which the sustainability statement is now applied to all strategic sites identified in SP3 will mean that the effects on waste management infrastructure of new development are considered.</p>	<p>Recommendation addressed.</p> <p>Whilst policy DB6 has been deleted in the final Modifications, the requirement for a sustainability statement has been included within a revised DBE1. Table D1: Sustainable Design and Construction Measures Checklist outlines the matters</p>

²⁶ Canterbury City Council Report to Overview Committee 'Canterbury District Local Plan – response to "Preferred Options" consultation comments (Regulation 18); publication of pre-Submission Draft Plan (Regulation 19); and submission of draft Plan for Examination (Regulation 22)', 2nd April

Recommendation	Council Response or Amendment ²⁶	Update in light of Main Modifications
<p>Potential to also ensure opportunities to minimise/reduce waste generation once in use will also require consideration. Could most reasonably be captured in modification to DBE1 and referenced in policy to waste and recycling i.e. 'All development should respond to the objectives of sustainable development and reflect the need to safeguard and improve the quality of life for residents, conserve energy resources and protect and enhance the environment'. Accompanying text to the policy could outline what is included in this broader definition of resources.</p>	<p>Policy DBE1 amended to reflect recommendation as follows: <i>"All development should respond to the objectives of sustainable development and reflect the need to safeguard and improve the quality of life for residents, conserve energy resources such as energy, and by reducing/minimising waste and protect and enhance the environment"</i>.</p>	<p>to be addressed. This includes specific measures for waste reduction, recycling and resource efficiency. The modification to Policy SP3 requires a comprehensive masterplan for strategic site allocations, including consideration of how they relate to their surroundings.</p>
<p>Policy DBE6 requires that Sustainability Statement explaining how a range of sustainability measures in table D1 (which includes SuDS) have been taken into account to accompany the planning application. However, although the statement will be required for all development qualifying under the requirements of the General Development Order 1995, it may be useful for clarity to require that a statement will be required for all sites identified in policy SP3. We note the measures referenced in table D1 and would suggest that the some measures be modified (for example, 'the source of energy used' could be changed to 'preferential use of low carbon energy sources and evidence that on site renewables energy generation explored') and additional measures such as 'avoiding or minimising any emissions or discharges' could be added. Policy DBE6 also identifies that an Energy Statement is required in appropriate circumstances. It would be useful to clarify what would be required in such a statement and what circumstances require a statement to be completed.</p>	<p>Policy DBE6 amended to reflect recommendation as follows: <i>"Sustainability statements including an energy statement, will also be required in appropriate circumstances, particularly with applications for major development, and should demonstrate how the proposal has responded to the objectives of sustainable development and taken into account the checklist in table D1. In addition, a Sustainability Statement will be required for all the sites identified in policy SP3"</i>.</p>	<p>Policy DBE6 has been deleted in the Modifications. The requirement for a sustainability statement has been included within a revised DBE1 which includes reference to Table D1: Sustainable Design and Construction Measures Checklist. Policy SP3 clarifies that all strategic sites will require a sustainability statement. The proposed modifications to Table D1 include clarification of the content of an Energy Statement. Policy CC3 encourages the use of local / district renewable and low carbon energy schemes for strategic sites and also evidence of why such schemes are not viable or feasible if they are not proposed. No further action required.</p>
<p>Potential to add reference to Policy CC12 to the Water Framework Directive to address potential to exceed WFD water quality objectives as part of the first sentence 'The Council will require that new development incorporates well designed mitigation measures to ensure that there is no adverse effect on water quality, both during construction and during the lifetime of the development'. This would seek to ensure that any future development is consistent with the overall</p>	<p>Policy CC12 has been amended to reflect additional references to the Water Framework Directive and on water quality: <i>"The Council will require that new development incorporates well designed mitigation measures to ensure that the water environment does not deteriorate there is no adverse effect on water quality, both during construction and during the lifetime of the development. Furthermore, the Council will seek to ensure that every opportunity is taken to</i></p>	<p>Recommendation addressed. Text in the last sentence of CC12 has been amended in the Modifications make it compliant with the NPPF. It now reads: <i>"Any new development should not compromise Water Framework Directive objectives."</i></p>

Recommendation	Council Response or Amendment ²⁶	Update in light of Main Modifications
objectives and targets for water quality under the Water Framework Directive.	<p><i>enhance existing aquatic environments and ecosystems. This will include the restoration of natural river features (including riverbanks) and removal of barriers to fish passage when appropriate opportunities arise.</i></p> <p><i>Any new development must not place further pressure on the water environment and compromise Water Framework Directive objectives”.</i></p>	
Potential to enhance performance of Policy CC13 by including measures for maximising efficiency (reduction of leakage) and reducing water demand. These are mentioned in the context (including Code for Sustainable Homes) and are also consistent with the measures taken by water companies and their inclusion would make the policy stronger.	<p>Policy CC13 has been amended to include measures to maximise water efficiency. The following additional text has been added:</p> <p><i>“Development should minimise water use as far as practicable by incorporating appropriate water efficiency and water recycling measures. In new homes, the Council will seek a required level of 105 litres maximum daily allowable usage per person in accordance with Level 4 of the Code for Sustainable Homes”.</i></p>	<p>Recommendation addressed.</p> <p>The text has been amended in the Modifications to reflect changes in national policy, as follows:</p> <p><i>‘Development should minimise water use as far as practicable by incorporating appropriate water efficiency and water recycling measures. In new homes, the City Council will seek a required level of 110 litres maximum daily allowable usage per person in accordance Regulation 36(2)(b) of the Building Regulations 2010 (as amended).’</i></p>
Potential to clarify what 'exceptional circumstances' are in Policy HE1, 'Development must conserve and where appropriate enhance, or reveal, the significance of heritage assets and their settings. Other than in exceptional circumstances development will not be permitted where it is likely to cause harm to the significance of heritage assets or their setting'.	<p>Policy HE1 has been amended and the phrase 'exceptional circumstances' has been deleted. This also ensures consistency with the requirements of the NPPF.</p>	<p>Recommendation addressed. Note further changes to HE1 proposed but no impact on this recommendation.</p>
Potential to revise Policy QL12 in a manner that is worded similarly to QL11 so that 'Development that could directly or indirectly result in material additional pollutants other than air and worsening environmental quality within the area surrounding the development site will not be permitted unless measures acceptable and agreed by the appropriate regulator have been taken as part of the proposal'.	<p>No changes have been made to Policy QL12. This policy relies on other policies for the assessment of potential pollution impacts. Policy QL12 relates to the imposition of planning conditions / agreements to ensure that the risk of potential pollution impacts is minimised rather than the assessment of impacts.</p>	<p>No further action required.</p>
We would encourage the Council to review its approach to presenting how it has addressed the requirements of the duty to co-operate and make earlier and clear reference to the many instances of how it has addressed the duty. The current section in the Vision chapter on the duty to co-operate acknowledges the long history of co-operation that the Council has had with the East Kent authorities and the Kent County Council, which informed the contributions to the South East Plan, the Sub-Regional Strategy and the Sustainable Community Strategy. However, it is not evident within this section, how the Council has worked with the range of identified bodies on the	<p>Additional text to explain how the Council has met the duty to co-operate in paragraph 1.24 –1.33 of the draft Local Plan:</p> <p><i>“The Council has had extensive discussions with neighbouring Councils as the draft Plan has developed from the initial futures study. The clear intention is for the different areas of East Kent, with their strengths, to contribute different aspects of economic activity to a sub-regional “mosaic” economy. It is not considered that the provisions of the draft Plan will have a negative impact on the wider East Kent economy and that it may in fact have a positive long-term effect on</i></p>	<p>Recommendation addressed.</p>

Recommendation	Council Response or Amendment ²⁶	Update in light of Main Modifications
development of the current draft Local Plan.	<i>other local economies in East Kent. The Council has also engaged with a range of other service providers, such as the Clinical Commissioning Group and South East Water, to ensure that the Plan reflects their priorities, consistent with the strategy of the Plan."</i>	

Further observations arising from the SA of the Main Modifications were also identified in the accompanying SA Report²⁵. These observations are summarised below, although in this instance the changes suggested were not considered necessary by the Inspector and have therefore not been included in the adopted Local Plan:

- ▶ **Policy TCL7 'Wincheap Retail Area'**: The revised justification for the policy highlights the intention to prepare a development principles document that includes consideration of the needs for any existing occupants that may not wish to remain when redevelopment takes place. The requirement to consider the future needs of existing occupants could also be referenced in the policy.
- ▶ **Policy DBE1 'Sustainable Design and Construction'**: This policy could make reference to the voluntary use of the Home Quality Mark. This would be consistent with national policy but provide the potential to deliver benefits beyond those required by the Building Regulations.
- ▶ **Policy DBE8 'Inclusive Design'**: This policy could make reference to the voluntary use of the Lifetime Home Standard as there are elements of this that go beyond those required by the Building Regulations.

4. How Opinions Expressed During Consultation Have Been Taken into Account

4.1 Overview

As set out in **Section 1.2**, the development of the Local Plan has been informed by extensive, ongoing engagement and public consultation, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. On submission of the Local Plan to the Secretary of State, the Council published a Consultation Statement²⁷ which set out the consultation undertaken during the preparation and publication of the Local Plan, a summary of the main issues raised and details of how the comments received have been taken into account.

Following consultation on the scope of the SA in January 2010, SA Reports have been prepared and published for consultation at each key Local Plan stage, as follows:

- ▶ Core Strategy Options Report (January 2010);
- ▶ Preferred Option Draft Local Plan (May 2013);
- ▶ Publication Draft Local Plan (June 2014);
- ▶ Proposed Amendments (November 2015);
- ▶ Main Modifications (February 2017).

4.2 SA Consultation Summary

A five week consultation was undertaken on the 2010 Scoping Report which concluded in November 2009; a total of three responses were received from Kent County Council, the Environment Agency and Natural England. Responses included requests for the inclusion of additional plans and programmes and baseline information as well as for changes to the objectives and guide questions that comprised the proposed SA Framework. In response to the comments received, the scoping elements of the SA were updated as appropriate and the approach to the SA revised. Appendix F to the Scoping Report presents a detailed summary of the responses received and the action taken as a result.

Consultation on the 2010 Core Strategy Options SA Report took place between January and March 2010. A total of eight responses were received to the Report from organisations including (inter alia) Environment Agency, Natural England, parish councils, developers/agents and members of the public. Comments ranged from those that were supportive of the approach and conclusions to those questioning the outcomes. Queries related to the scope of the SA objectives, flood risk, groundwater, the settlement hierarchy and the appraisal of the proposed spatial strategy and development locations.

Consultation on the 2013 Preferred Options SA Report took place between June and August 2013. A total of 23 responses were received to the Report from organisations including (inter alia) Natural England, parish councils, South East Water, CPRE Kent, RPSB, developers/agents and members of the public. Comments related to all aspects of the SA Report although the majority concerned the findings of the appraisal. A detailed summary of the responses received to the consultation is contained in Appendix B to the 2014 Publication Draft Local Plan SA Report. Consultation on the Publication Draft Local Plan SA Report itself took place between June and July 2014. A total of 15 responses were received to the Report with the majority again concerning the findings of the appraisal.

The 2015 SA Report Addendum was published for consultation between November 2015 and January 2016. A total of 121 comments were received from 60 respondents, principally concerning the findings of the site appraisal. A summary of this consultation is available on the Council's website via the following link:

²⁷ Canterbury City Council (2014) *Consultation Statement*. Available from <https://www.canterbury.gov.uk/media/949421/CDLP-35-Canterbury-District-Local-Plan-Submission-draft-Consultation-Statement-18-November-2014-CCC.pdf> [Accessed June 2017].



<https://www.canterbury.gov.uk/media/1103582/Addendum-to-the-Sustainability-Appraisal-of-the-Canterbury-District-Local-Plan-Publication-Draft.docx>.

The 2017 SA Report Addendum concerning the Council's proposed Main Modifications to the Local Plan was published for a six week consultation period commencing 10th February 2017. A total of six responses to the SA Report were received from five organisations and individuals; however, following a review of the responses received, no further amendments to the 2017 SA Report Addendum were considered necessary.

5. The Reasons for Choosing the Local Plan as Adopted in the Light of the Other Reasonable Alternatives Considered

5.1 Overview

Article 5 (1) of the SEA Directive and SEA Regulation 12(2) require that “*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*”. Information to be provided includes “*an outline of the reasons for selecting the alternatives dealt with*” (SEA Directive Annex I (h) and SEA Regulations Schedule 2 (8)).

The European Commission guidance on the SEA Directive²⁸ discusses possible interpretations of handling ‘reasonable alternatives’ as required by Article 5(1). It states that “*The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme*”.

As set out in **Section 3**, the SA has been an iterative process undertaken alongside and integrated with the development of the Local Plan itself. The reasonable alternatives considered in preparing the Local Plan and appraised through the SA have related to:

- ▶ development scenarios (the amount of growth to be accommodated in the District);
- ▶ spatial development options (where, in broad terms, growth should be located);
- ▶ site allocations; and
- ▶ site configurations.

Collectively, these plan components are referred to as the Preferred Development Option for the Local Plan. The findings of the appraisal of the Preferred Development Option and reasonable alternatives were reported in the SA Reports at each stage of Local Plan preparation and subject to public consultation.

5.2 The Reasons for Choosing the Local Plan and for Rejecting Reasonable Alternatives

The Local Plan has evolved over a number of years from the Core Strategy Options Report in 2010. Nine broad spatial strategy options were appraised at that time through the SA. An option that combined five of these was considered the most appropriate basis for consideration. The Development Requirements Study (DRS) (January 2012) then included 10 different scenarios for the amount of development to be accommodated in the District. These scenarios were appraised against the sixteen SA objectives and a preferred scenario selected (Scenario E). The DRS was accompanied by a SA Technical Note (June 2012) which used the same methodology as subsequent SAs.

The quantum of development chosen from the DRS was substantially greater than that used in the initial spatial alternatives, which had been based on the revoked South East Regional Plan (510 dwellings/annum). The DRS, 2012 (Scenario E) identified it would support a more ambitious economic vision for the District and increased housing provision to 780 dwellings/annum. In 2013, the Council undertook an appraisal of the Preferred Option Local Plan which included two alternative configurations of sites - ‘Canterbury Focus’ and ‘Coastal Towns and Hersden Focus’. The process by which the Local Plan has evolved and the alternatives considered is set out in both the 2013 and 2014 SA Reports with the preferred approach being to focus

²⁸ EC (2001) *Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment*. Available from http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Accessed June 2017].

development to the urban areas of Canterbury, Herne Bay and Whitstable to optimise growth and minimise detrimental environmental impacts.

Following the July 2015 Examination hearings, the Inspector advised the Council to increase its housing requirement to 800 dwellings/annum. The Council then undertook further work, which included a review of SHLAA sites. A number of sites were then put forward through the Proposed Amendments consultation (27 November 2015 – 22 January 2016) and a further SA was carried out. These sites were then subject to examination at the stage 2 hearings in July and September 2016.

In summary, the evolution of the submission Local Plan has taken place over a number of years from the Core Strategy Options Report in 2010. Accordingly, there have been various iterations with SA work taking place alongside them. The SA sets out the process by which sites were selected in terms of their relationship with the overall spatial strategy, having regard in particular to transport and infrastructure delivery considerations and the relationship with other Local Plan policies. A total of 181 sites were appraised in the first instance and another nineteen added following the Preferred Option consultation. All were appraised in the same manner against the sixteen SA objectives.

The reasons for inclusion or rejection of sites has been set out at the various stages of Local Plan preparation and Examination through the SA.

6. Monitoring

6.1 Overview

The SEA Regulations (17 (1)) set out that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*”. The Regulations are clear that it is not necessary to monitor everything. Instead, monitoring should focus on significant effects.

The National Planning Practice Guidance states that details for monitoring the significant effects of implementing a local plan must be included in the SA report, the post adoption statement or in the local plan itself. The Guidance also states that the monitoring results should be reported in the local planning authority’s monitoring report. Monitoring the adopted Local Plan for sustainability effects can help to answer questions such as:

- ▶ Were the SA’s predictions of sustainability effects accurate?
- ▶ Is the Local Plan contributing to the achievement of desired SA objectives?
- ▶ Are mitigation measures performing as well as expected?
- ▶ Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

6.2 The Local Plan SA Monitoring Framework

Monitoring the Local Plan’s implementation will focus on:

- ▶ significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage occurs;
- ▶ significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
- ▶ where there is the potential for effects on sensitive environmental receptors.

Appendix A presents the indicators that comprise the Monitoring Framework for the Local Plan. Consistent with the monitoring proposals contained in the 2014 Publication Draft Local Plan SA Report, indicators have been identified for all of the SA objectives contained in the SA Framework. The monitoring programme will predominantly use existing data collated at the national and local level. The metrics are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

In addition to the SA monitoring process, the Local Plan will also be subject to an ongoing programme of monitoring, which will be reported on an annual basis in the Council’s Authority Monitoring Reports (AMRs). The AMRs will be available to view on the Council’s website and will be used to monitor the implementation of the Local Plan’s policies in terms of whether they are contributing to the achievement of the Plan Vision and Objectives and to also identify unexpected outcomes which will allow the Council to take appropriate action.

The monitoring process for the Local Plan and the SA will be carried out on an annual basis through the AMR process.

Appendix A

Monitoring Framework

SA Objective and Key questions	Indicators	Source
Sustainable innovative and productive economy that delivers high levels of employment		
<p>1. Economy and Employment To achieve a strong and stable economy which offers rewarding and well located employment opportunities to everyone.</p>	<ul style="list-style-type: none"> Total amount of additional employment floorspace by type. Employment land available by type. Loss of employment floorspace by type. 	Authority Monitoring Report (AMR)
<p>1.1 Will it improve efficiency, competitiveness, vitality and adaptability of the local economy?</p>		
<p>1.2 Will it encourage investment in businesses, people and infrastructure for the long term?</p>	<ul style="list-style-type: none"> The total number of businesses. Percentage of businesses by sector. Job density. The percentage of employed people working in each sector. The average weekly earnings in the District. The proportion of working-age people who are in work. 	Nomis
<p>1.3 Will it increase the number of businesses in the District?</p>		
<p>1.4 Will it help diversify the economy?</p>		
<p>1.5 Will it lead to an increase in the local skill base through recruitment from Canterbury's Higher education establishments?</p>		
<p>1.6 Will it help to foster growth in the knowledge based economy?</p>		
<p>1.7 Will it promote sustainable tourism?</p>	<ul style="list-style-type: none"> The percentage of working-age people with qualifications at, or equivalent to, NVQ level 2. 	Office for National Statistics (ONS) (Labour Force Survey)
<p>1.8 Will it meet the employment needs of local people?</p>	<ul style="list-style-type: none"> The percentage of working-age people with no qualifications. 	
<p>1.9 Will it improve physical access to jobs through improved location of sites and proximity to transport links?</p>	<ul style="list-style-type: none"> Number of people gaining five or more GCSEs at grade C or above. 	
	<ul style="list-style-type: none"> Average distance travelled to place of work. 	ONS
<p>2. Rural/Coastal Communities To sustain vibrant rural and coastal communities.</p>	<ul style="list-style-type: none"> The number of rural buildings brought back into business use. Affordable housing completions in rural areas. 	Canterbury City Council
<p>2.1 Will it assist with the diversification of the rural/coastal economy?</p>		
<p>2.2 Will it support and encourage the growth of rural/coastal businesses?</p>		

SA Objective and Key questions	Indicators	Source
<p>2.3 Will it retain village/coastal services and local trading schemes?</p> <p>2.4 Will it assist in the provision of affordable houses in rural/coastal areas?</p>		
Protect and enhance the physical and natural environment		
<p>3. Water Quality To protect and improve the quality of inland and coastal waters.</p> <p>3.1 Will it minimise the adverse effects on ground and/or surface water quality?</p> <p>3.2 Will it avoid adverse impacts on coastal waters, fisheries and bathing waters?</p> <p>3.3 Will it protect and improve ground and surface water quality?</p>	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. • % of river stretches with good/very good biological water quality. • % of river stretches with good/very good chemical water quality. • Coastal bathing water quality –compliance with European water quality objectives. 	<p>AMR</p> <p>Environment Agency</p>
	<ul style="list-style-type: none"> • The Shellfish Harvesting Area Classification. 	<p>Food Standards Agency</p>
<p>4. Transport Reduce road traffic and its impacts, promoting more sustainable modes of transport.</p> <p>4.1 Will it reduce travel demand?</p> <p>4.2 Will it improve transport of goods/people by more sustainable means?</p> <p>4.3 Will it encourage walking, cycling and use of public transport?</p> <p>4.4 Will it help to reduce traffic congestion and improve road safety?</p> <p>4.5 Will it reduce the need to travel?</p>	<ul style="list-style-type: none"> • Car ownership - % of households owning one or more car/van. • Travel to work by different modes (e.g. bus, train, car). • Average distance travelled to work. • Commuting flows. • Percentage of schools with a School Travel Plan. • Percentage of children travelling to primary school and secondary school by different transport methods. 	<p>ONS</p> <p>Kent County Council (KCC). Note: only those schools covered by travel plans are monitored.</p>
	<ul style="list-style-type: none"> • Number of people killed or seriously injured in road traffic accidents. • Volume of traffic. 	<p>KCC</p>
	<ul style="list-style-type: none"> • Number of car free developments (i.e. developments where car 	<p>Canterbury City Council</p>

SA Objective and Key questions	Indicators	Source
	<p>ownership is neither provided for, nor allowed).</p> <ul style="list-style-type: none"> Levels of air pollutants – whether National Air Quality Objectives are met (covers benzene, 1,3-butadiene, lead, sulphur dioxide, particles and nitrogen dioxide). CO₂ emissions associated with transport. 	<p>Canterbury City Council has a statutory obligation to monitor air quality. At present, carbon monoxide (CO), nitrogen dioxide (NO₂) and particles (PM10) are monitored. Annual Progress Reports are submitted to DEFRA.</p> <p>Department for Business, Energy and Industry Strategy (BEIS)</p>
<p>5. Countryside and Historic Environment To protect and improve landscapes for both people and wildlife and to protect and maintain vulnerable assets (including built and historic)</p> <p>5.1 Will it improve access to the countryside and open space?</p> <p>5.2 Will it avoid adverse impacts and enhance designated and non-designated landscape features?</p> <p>5.3 Will it protect and enhance Green Infrastructure throughout the district?</p> <p>5.4 Will it improve access to urban open space?</p> <p>5.5 Will it help to protect and enhance sites, areas and features of historic, cultural archaeological and architectural interest?</p> <p>5.6 Will it help to conserve historic buildings, places and spaces that enhance local distinctiveness, character and appearance through sensitive adaptation and re-use?</p> <p>5.7 Will it improve and promote access to buildings and landscapes of historic/cultural value?</p>	<ul style="list-style-type: none"> Amount of eligible open spaces managed to green flag award standard. Number of planning applications refused on the grounds of potential damage to protected landscapes. Number of new protective designations (or extensions of existing designations) created to safeguard the landscape. Numbers of hectares of landscape/open space within the District positively improved. Number of landscapes managed following guidance from an agreed management plan e.g. Dane John; Reculver Country Park; Wraik Hill; Duncan Down. Number of key historic landscapes restored and revitalised using external funding awards. Open Space Indicators, such as number of trees planted, green flags awarded, area of open space lost, percentage of households within open space standards identified by the Council's Open Space Strategy, to ensure sufficient areas of open space are maintained. Number of new access agreements implemented to extend public access within the District. 	<p>AMR</p> <p>Canterbury City Council</p> <p>KCC Public Rights of Way section.</p>

SA Objective and Key questions	Indicators	Source
	<ul style="list-style-type: none"> Number of listed buildings and number of listed buildings at risk. Number of Scheduled Monuments, individual records on the Historic Environment Record. 	Historic England
	<ul style="list-style-type: none"> Number of visits to/usage's of museums per 1,000 population. Number of Blue Flag beaches. 	Canterbury City Council
<p>6. Geology and Biodiversity To avoid damage to geological sites and improve biodiversity.</p> <p>6.1 Will it avoid damage to and enhance species and habitats?</p> <p>6.2 Will it minimise habitat fragmentation?</p> <p>6.3 Will it provide opportunities for new habitat creation or restoration and link existing habitats as part of the development process?</p> <p>6.4 Will it ensure the sustainable management of natural habitats?</p> <p>6.5 Will it avoid damage to and protect geologically important sites?</p>	<ul style="list-style-type: none"> Change in areas and populations of biodiversity importance, including change in priority habitats and species (by type) and change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance. 	AMR Natural England Joint Nature Conservation Committee Kent Wildlife Trust
	<ul style="list-style-type: none"> Percentage of Sites of Special Scientific Interest in favourable, favourable recovering and unfavourable condition. 	Natural England
	<ul style="list-style-type: none"> Area of land managed by Woodland Grant Scheme. 	Forestry Commission
	<ul style="list-style-type: none"> Advice on planning applications received from KCC on biodiversity mitigation and enhancement measures and the proportion of applications: <ul style="list-style-type: none"> withdrawn, refused or dismissed at appeal for biodiversity reasons; refused for biodiversity reasons; approved including conditions or notes for recommended biodiversity measures. 	KCC/AMR
	<ul style="list-style-type: none"> Number of habitat enhancement measures implemented as part of new developments. 	Canterbury City Council

SA Objective and Key questions	Indicators	Source
<p>7. Climate Change, Energy and Air Quality To reduce the causes and impacts of climate change, improve air quality and promote energy efficiency.</p>	<ul style="list-style-type: none"> Total CO₂ emission from gas and electricity usage. CO₂ emissions per capita. Energy consumption. 	BEIS
<p>7.1 Will it reduce vulnerability to climate change?</p>	<ul style="list-style-type: none"> Renewable energy capacity installed by type. 	AMR
<p>7.2 Will it reduce or minimise greenhouse gas emissions?</p>		
<p>7.3 Will it maintain and improve local air quality?</p>	<ul style="list-style-type: none"> Air Quality Management Areas declared as a consequence of development. 	Canterbury City Council
<p>7.4 Will it minimise the need for energy?</p>		
<p>7.5 Will it increase efficiency in the use of energy?</p>		
<p>7.6 Will it help to increase the share of energy generated from renewable sources?</p>		
<p>8. Flood Risk and Coastal Erosion To reduce the risk of flooding and coastal erosion which would be detrimental to the public well-being, the economy and the environment.</p>	<ul style="list-style-type: none"> Compliance with Defra High Level Targets for flood and coastal erosion. 	Environment Agency
<p>8.1 Will it help to minimise the risk of flooding to existing and new developments/infrastructure?</p>	<ul style="list-style-type: none"> Area of developed land on floodplain. 	Environment Agency
<p>8.2 Will it help to discourage inappropriate development in areas at risk from flooding and coastal erosion?</p>		
<p>8.3 Will it help to manage and reduce the risks associated with coastal erosion?</p>		
<p>8.4 Will it reduce vulnerability to flooding and coastal erosion?</p>	<ul style="list-style-type: none"> Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. 	AMR
Just society that promotes social inclusion, sustainable communities and personal wellbeing		
<p>9. Access to Services Share access to services and benefits to prosperity fairly.</p>	<ul style="list-style-type: none"> Overall District ranking in English Indices of Deprivation. Ranking of Lower Super Output Areas (LSOAs) of deprivation in the District, out of the whole of England. Proportion of the population who live in wards that rank within the most deprived 	Department of Communities and Local Government Index of Multiple Deprivation
<p>9.1 Will it improve social and environmental conditions in the most deprived areas?</p>		
<p>9.2 Will it increase economic activity?</p>		

SA Objective and Key questions	Indicators	Source
<p>9.3 Will it improve access to skills and training for raising employment potential?</p> <p>9.4 Will it help to provide more equal access to opportunities, services and facilities (e.g. sport, culture, health, education, open space etc.)?</p>	<p>25% of wards in the country.</p> <ul style="list-style-type: none"> • Employment rates in most deprived wards • Number of income support claimants • Distance travelled to work and methods of travel used. • Travel time to employment sites and key services and facilities. 	<p>ONS</p> <p>Department for Transport</p>
<p>10. Sustainable Living and Revitalisation To revitalise town and rural centres and to promote sustainable living.</p> <p>10.1 Will it improve townscapes/rural centres and physical assets?</p> <p>10.2 Will it encourage more people to live in town centres?</p> <p>10.3 Will it improve provision of shops or services within town centre?</p> <p>10.4 Will it promote responsible tourism which is both ecologically and culturally sensitive?</p> <p>10.5 Will it improve physical access to services, such as a GP, a hospital, schools, areas of employment and retail centres?</p>	<ul style="list-style-type: none"> • Total amount of floorspace for town centre uses by area. • The number of pedestrians in town centres. • Number of mixed use development schemes • Amount of retail floorspace completed. • Loss of retail floorspace. • Number of applications permitted for new community assets. • Number of community facilities lost to other uses. 	<p>AMR</p> <p>Canterbury City Council</p>
<p>11. High Quality Design and Sustainability To encourage sustainable design and practice.</p> <p>11.1 Will it use architectural design to enhance the local distinctiveness of development?</p> <p>11.2 Will it improve the quality of the built environment through high standards of sustainable design and construction of new and existing buildings?</p> <p>11.3 Will it minimise light and noise pollution?</p>	<ul style="list-style-type: none"> • No indicators identified. 	<p>N/A.</p>
<p>12. Housing To make suitable housing available and affordable to everyone.</p> <p>12.1 Will it encourage more access to affordable housing?</p>	<ul style="list-style-type: none"> • Gross Affordable housing completions. • All net additional dwellings – previous years. • All net additional dwellings - for the reporting year. 	<p>AMR</p>

SA Objective and Key questions	Indicators	Source
<p>12.2 Will it encourage access to decent housing?</p> <p>12.3 Will it provide an appropriate mix of housing to meet residents' needs and aspiration and create balanced communities?</p> <p>12.4 Will it reduce the number of unfit and empty homes?</p> <p>12.5 Will it reduce the number of empty homes?</p> <p>12.6 Will it reduce the level of homelessness in the District?</p>	<ul style="list-style-type: none"> • All net additional dwellings – in future years. • Five year housing land supply. • Forecast additional dwellings/land supply up to the end of the Local Plan period. • Net additional pitches provided for Gypsies, Travellers and Travelling Showpeople. 	
	<ul style="list-style-type: none"> • Housing affordability ratio. 	Department of Communities and Local Government
	<ul style="list-style-type: none"> • Number of applicants on the Housing Register. • Annual shortfall in affordable housing. • Affordable housing as a % of new development. • % of houses with no central heating or without sole use of a bath/shower and toilet. • Number of properties empty for more than 6 months. • as a result of action by the Council. 	Canterbury City Council
	<ul style="list-style-type: none"> • % of homes meeting the Decent Homes Standard 	English Housing Condition Survey
	<ul style="list-style-type: none"> • % of housing by tenure (i.e. owner-occupied, Local Authority tenancies, housing association tenancies and private sector rental). • % of housing by type (i.e. detached, semi-detached, terraced, flats). 	ONS
<p>13. Quality of Life To improve the quality of life for those living and working in the district.</p>	<ul style="list-style-type: none"> • The average number of business-related crimes reported. 	Communities and Local Government Index of Multiple Deprivation
<p>13.1 Will it reduce actual levels of crime?</p> <p>13.2 Will it reduce the fear of crime?</p> <p>13.3 Will it reduce death rates and negative health impacts in key vulnerable groups?</p> <p>13.4 Will it promote healthy lifestyles?</p>	<ul style="list-style-type: none"> • Crimes committed for: <ul style="list-style-type: none"> ○ Domestic burglaries (for 1,000 households); ○ Violent offences (for 1,000 people); ○ Vehicle crimes (for 1,000 people). 	ONS

SA Objective and Key questions	Indicators	Source
<p>13.5 Will it improve peoples' perception of their local area being a place where people from different ethnic backgrounds get on well together?</p> <p>13.6 Will it promote sport and physical activity?</p>	<ul style="list-style-type: none"> Death rate by cause (standardised mortality ratio – a method of comparing death rates between different sections of the population) for every 100,000 people in the following categories. Cancer in the under 75s. Circulatory diseases in the under 75s. Suicide and undetermined injury - all ages. All accidents - all ages. 	<p>Communities and Local Government Index of Multiple Deprivation Primary Care Trust</p>
	<ul style="list-style-type: none"> % of cigarette smokers, overweight people and people who drink above 'sensible' weekly limits. 	<p>Primary Care Trust</p>
	<ul style="list-style-type: none"> The % of population participating in sport and physical activity. 	<p>Sport England</p>
	<ul style="list-style-type: none"> Access to green space. 	<p>Natural England Accessible Natural Greenspace Standards</p>
<p>Use resources and energy as efficiently as possible</p>		
<p>14. Use of Land To deliver more sustainable use of land in more sustainable location patterns.</p>	<ul style="list-style-type: none"> New dwellings - on previously developed land. 	<p>AMR National Land Use Change Statistics</p>
<p>14.1 Will it promote the wise use of land (minimise development on greenfield land)?</p> <p>14.2 Will it reduce the amount of derelict, degraded & underused land?</p> <p>14.3 Will it reduce land contamination?</p> <p>14.4 Will it promote the use of previously developed land?</p> <p>14.5 Will it encourage urban renaissance?</p>	<ul style="list-style-type: none"> % of contaminated land remediated. 	<p>KCC</p>
<p>15. Natural Resources To ensure the prudent use of natural resources and the sustainable management of existing resources.</p>	<ul style="list-style-type: none"> Estimated water consumption (average household consumption (l/head/d) – South East and Southern water). 	<p>Water Company Returns</p>
<p>15.1 Will it minimise the demand for raw materials?</p> <p>15.2 Will it promote the use of local resources?</p>	<ul style="list-style-type: none"> Total abstractions from non-tidal surface waters and ground waters. 	<p>Environment Agency (data may not be available at district level)</p>

SA Objective and Key questions	Indicators	Source
<p>15.3 Will it reduce minerals extracted and imported?</p> <p>15.4 Will it increase efficiency in the use of raw materials and promote recycling?</p> <p>15.5 Will it minimise the use of water and increase efficiency in water use?</p> <p>15.6 Will it protect water resources?</p> <p>15.7 Will it encourage farming practices sensitive to the character of the countryside?</p>	<ul style="list-style-type: none"> Number of developments with Sustainable Urban Drainage Systems. Area of land covered by agro-environmental schemes. 	<p>KCC</p> <p>DEFRA</p>
<p>16. Waste To reduce generation and disposal of waste, and achieve sustainable management of waste.</p> <p>16.1 Will it reduce the amount of waste generated?</p> <p>16.2 Will it encourage the recycling of waste?</p> <p>16.3 Will it increase the demand for recycled materials?</p> <p>16.4 Will it ensure the management of wastes consistent with the waste management hierarchy?</p>	<ul style="list-style-type: none"> Percentage of the total tonnage of household waste that has been recycled; composted; used to recover heat, power and other energy resources; and land filled against total tonnage collected. Year on year reduction of waste to landfill. Number of green procurement plans that include procurement of recycled products. Number of new businesses dealing with recyclate within the district. 	<p>Canterbury City Council KCC</p> <p>Waste Dataflow Statistics - DEFRA/EA KCC</p> <p>KCC</p>

