

This submission relates to the Dover District Council’s Sustainability Appraisal (the “SA”) supporting its Draft Local Plan and is lodged on behalf of Mr David John Woodward (“Mr Woodward”) the Owner of 0.72 ha of land previously associated with Eastside Farm, East Langdon, Kent CT15 5JF, identified under the Housing and Land Availability Assessment (“HELAA”) as site “LAN005”.

1. The LAN005 site was submitted by Mr Woodward as a suitable and sustainable site for the development of up to 10 dwellings following the Council’s call for sites¹. A copy of Mr Woodward’s response to the call for sites dated 16 April 2019 is attached as Annex 1.

2. Although the LAN005 site was accepted following its Stage 1 assessment, Dover District Council (“the DDC” / “the Council”) rejected it under its Draft Local Plan, without proper cause and in breach of the National Planning Policy Framework (“NPPF”) as particularised below.

3. The Council also rejected Mr Woodward’s outline planning application for this site dated 3 November 2021 with all matters reserved (reference 21/01744), even though this is a brownfield and /or derelict site as it includes a former commercial workshop and hardstanding that is no longer used for light industrial purposes or for any purpose at all.

4. As a matter of law this site ought to have already been identified by the Council pursuant to Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 as a suitable brownfield site for development within the village of East Langdon, in preference to allowing the development on green field sites around the village.

5. The Inspectors’ general ED14 Questions 5 and 7 on page 6 (quoted in bold below) are directly relevant to the site-specific issues raised by DDC’s unjustified rejection of the LAN005 site.

Q5 on page 6. ***“How were suitable and potentially suitable housing sites determined for the purposes of the SA? What type of sites were discounted as part of this process?”***

Q7 on page 6. ***“Is the SA based on a robust and up-to-date assessment of housing and employment sites? Were adequate reasonable alternative options considered and were they tested on a consistent basis?”***

6. The Council has not complied with its statutory obligations as it has failed to identify all the most suitable and sustainable housing sites in the District. Furthermore, the Council has failed to comply with its own published criteria for identifying potential sites and it has manipulated the settlement boundaries (certainly in the village of East Langdon) in breach of the NPPF, including para 16(d)².

7. In answer to the Inspectors’ Question 5 (above) in relation to the LAN005 site, the Council’s methodology and criteria is set out in its published Rural Settlement Hierarchy

¹ The same site was offered following the Council’s previous call for sites and was rejected.

² Para 16(d) of NPPF provides, under the section headed “Plan Making”, “Plans should ...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”

Paper dated August 2022 (“the RSHP”), which forms part of DDC’s Regulation 19 submission.

8. However, the Council’s failure to properly identify the ‘as built’ settlement boundary at East Langdon has already and will continue to lead to an improper application of the NPPF and is therefore contrary to law.

9. At para 1.1 of its RSHP, the Council acknowledges,
The vision, strategic objectives and policies of the Dover District Regulation 19 Submission Draft Local Plan set out to deliver and manage the location of new development across the District over the plan period. Such policies must be developed in accordance with national planning policy and guidance which promotes, in the first instance, the principle of sustainable development, and which requires local planning authorities to ensure that, wherever possible, new development is located in the most sustainable locations.

10. At para 1.2 of its RSHP, the Council states,
Fundamental to the preparation of the Local Plan is an assessment of a range of quantitative and spatial options for delivering the required level of housing and economic development for the district.... This settlement Hierarchy Study has been undertaken as part of the evidence base for the Plan, and in particular the approach to residential windfall development in the rural areas of the district.

11. The Council then records in Appendix B of its RSHP at para 1.3
“Settlement confines are the boundary lines between areas of built or urban development (the settlement) and non-urban or rural development (the open countryside). Although settlement confines do not preclude all development beyond the confines, they do give clarity as to where new development within the confines or directly adjacent is likely to be acceptable in planning terms.”

12. Under section Appendix B headed Methodology for Reviewing and Setting Settlement Confines, the Council states the following:

(i) In paragraph 1.7,

The starting point for the Review of the settlement confines was that, for the purposes of this review, a settlement is considered to comprise a continuous built environment, based around a core community hub or structure(s) for example a public house, place of worship, school, village hall, retail outlet or commercial employment premises...;

(ii) In paragraph 1.8,

*The following criteria were used to judge what **should** be included within the built confines of a settlement:*

*All properties physically linked to the main (built) part of the settlement **should** be included within settlement confines, except those operating as farms as they principally relate to activities within the countryside; (...)*

*Settlement confines **should** include traditional rural buildings converted to residential use that are connected to the main body of the settlement, together with their residential curtilages; ... (Emphasis added)*

The repeated use of the more mandatory word ‘**should**’, as opposed to ‘could’ is significant when considering whether the Council has complied with its own identified criteria or whether, as we submit is the case, the Council has not consistently applied this criteria across the District.

13. Eastside Farm and Jossenblock³ together with St Augustine’s Church were among the original founding buildings out of which the village of East Langdon grew. These buildings lie at the physical heart of the original village but have been excluded by the Council from the defined settlement confines of the village. Both listed farmsteads are directly adjacent to what is now identified as the Village Green, which lies at the centre of the East Langdon Conservation Area. The Village Green is however of no great antiquity. At the beginning of the 20th Century it was the site of another farm (no longer in existence) as well as a blacksmith’s yard. To exclude Eastside Farm and Jossenblock, which are both “*traditional rural buildings [now] converted to residential use*” from the physical settlement confines of East Langdon, is wrong as a matter of history and logic and is contrary to DDC’s own published criteria/methodology set out in para 1.8 of Appendix B of the RSHP (quoted above).

14. No valid reason has been provided by the Council why it has done this at East Langdon. The Langdon Parish Council is recorded as simply agreeing with the Council’s proposals (as confirmed on page 38 of the RSHP). There is however substantial evidence available to suggest that improperly defining the settlement boundaries has been and is being used as a device by which otherwise lawful development is prevented and/or curtailed.

15. In Appeal reference APP/X2220/W/23/3314961⁴ the Langdon Parish Council made the following submission via its letter dated 17 July 2023,

“East Langdon Settlement Boundaries: The parish council responded to DDC’s settlement boundary review in September 2021 following a parish wide consultation during August 2021. The consensus was for the large heritage properties to remain outside the settlement boundary in the East Langdon conservation area to preserve the open rural aspects of the village green. The settlement boundary review has contributed to the proposed new District Local plan.”

16. This confirms there has been a deliberate manipulation of the settlement boundaries, which the Council has used to arbitrarily exclude suitable and sustainable sites in favour of developing alternative sites in the countryside on greenfield land. Such an approach is contrary to national planning policy and regulations. It must also call into question whether the same device is being used elsewhere in the District.

17. This is particularly relevant when viewed alongside the Council’s own statements concerning the historical importance of sites like LAN005 in successfully delivering **45% of all** new housing in the District and the Council’s acknowledged weakness in relying on single large strategic allocations that have **not** delivered. In the Council’s own words,

(i) “Windfall sites .. can offer a significant contribution to the supply of homes using previously developed land and vacant areas within settlement boundaries. Over the last 10

³ Neither of which are operating farms. They have been residential dwellings for more than 30 years.

⁴ This was Mr Woodward’s appeal from the Council’s decision in 21/01744 rejecting his outline planning application with all matters reserved.

years windfall development has made an important and sustained contribution to the provision of additional homes in the District, accounting for 45% of all completed dwellings within the District over this period”⁵ and,

(ii) [a weakness has been the],
“Historic reliance on single large strategic allocations to meet housing target, that has not delivered completions.”⁶

(Emphasis added)

18. This ‘bootstraps’ manipulation of the settlement boundary in East Langdon has been expressly relied upon by the Council⁷ in rejecting development of the LAN005 site. Yet this site includes a redundant light industrial workshop and hard standing that amounts to previously developed or brownfield land. Had the Council adopted the pro-active approach required of it under para 38 of the NPPF, or had it complied with paras 119, 120 and 121 of the NPPF as well as Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations, then this site would have already been identified as suitable and included for development in the Council’s Draft Plan.

19. By improperly and artificially manipulating the settlement boundaries of East Langdon the Council not only removes the *clarity* which *they* identify elsewhere in the RSHP as being desirable⁸, but they are deliberately avoiding the proper and lawful application of the NPPF.

20. The Council has accepted via their appeal statement in APP/X2220/W/23/3314 that at least part of the LAN005 site amounts to previously developed / brownfield land. But rather than adopt this site for development, DDC’s draft Local Plan has instead chosen to support a much larger development on a site that sits squarely in the countryside on greenfield land⁹. This cannot be considered sound policy in terms of spatial growth, transparency or consistency as required by the NPPF.

21. In the same Appeal reference APP/X2220/W/23/3314961, the inspector (Mr Guy Davies) in response to Mr Woodward’s submission that the East Langdon settlement boundary had been improperly drawn said this,

“The appellant criticises the settlement boundary as being too tightly drawn, excluding among other buildings St Augustines Church, Eastside Farm, and Jossenblock, and failing to reflect the built up area of this part of the village. I have some sympathy with that view as these buildings, including Eastside Farmhouse and the barns formerly associated with it, form part of the historic and visual grouping of buildings around the central green.”

⁵ Para 6.84 of the Council’s Reg 18 submission

⁶ DDC’s Housing Delivery Action Plan, published in July 2022

⁷ At Appendix 1a of the HELAA report the Council states the site is *unsuitable* alleging *inter alia*, “Development here would have a poor relationship to the settlement” and its rejection of Mr Woodward’s 21/01744 outline application.

⁸ Para 1.3 of Appendix B states, “Although settlement confines do not preclude all development beyond the confines, they do give **clarity** as to where new development within the confines or directly adjacent is likely to be acceptable in planning terms.”

⁹ This is the LAN003 site promoted by the Barratt Group for 40 homes.

22. Mr Davies also in response to Mr Woodward's submissions relating to the inconsistent way in which the Council has allowed other developments in the village including Church Farm Mews and land to the north of the village school (identified as Longhill Lane) indirectly confirms that the Council's failure to properly establish the settlement boundaries is having an improper impact on the grant of planning consents, and appeals to the Inspectorate, since at para 11 of his decision denying the Appeal (in APP/X2220/W/23/3314961) he states,

"These [sites] differ materially from the appeal site in policy terms in that Church Farm Mews lies within the confines of the village and is not therefore part of the countryside for planning purposes and the development at Longhill Lane was on a site allocated in the Dover District Land Allocations Local Plan 2015. While I note the arguments put forward by the appellant as to why the appeal site should be allocated, that is a matter for the draft Local Plan, and not pertinent to this appeal." (Emphasis added)

23. Church Farm¹⁰ was not however originally included within the drawn settlement confines of East Langdon. Mr Woodward was advised by the owner of this property (Mr Waller) that the Council of its own volition brought this property within the confines of the village sometime around 2005 and then invited Mr Waller to apply for planning consent, which was then granted for the successful development of 9 dwellings. This site is immediately adjacent to the west side of the Village Green and directly opposite Eastside Farm sitting on the other side of the Green. The Longhill Lane site lying to the east of the primary school in East Langdon had previously been outside the settlement confines too, as this was an agricultural greenfield site before being allocated by the Council under their 2015 plan¹¹.

24. Section 3 of the Council's RSHP refers at para 3.1 to the relevant aims of the NPPF and goes on to confirm the following:

*3.2 Paragraph 79 of the NPPF requires that new housing should be located where it will enhance or maintain the vitality of rural communities in order to promote sustainable development in rural areas. It also advises that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services and acknowledges that where there are groups of smaller settlements development in one village may support services in a village nearby.*¹²

3.4 Every local plan must be informed and accompanied by a Sustainability Appraisal. This allows for potential environmental, economic and social impacts of the proposals to be systematically taken into account, playing an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives.... (Emphasis added)

25. The Council has failed to follow its own criteria in section 3 of its RSHP by artificially manipulating and inaccurately defining the 'as built' settlement confines certainly in relation to the village of East Langdon. This means the objective and systematic approach required by the NPPF, has not been applied and permissions will continue to be denied based on improper grounds.

¹⁰ Another of the original founding properties within the village.

¹¹ This was the same plan that rejected the LAN005 brownfield site

¹² The close proximity of the HS1 train station at Martin Mill to the Village of East Langdon is relevant in this respect.

26. Furthermore irrespective of the settlement boundaries, the LAN005 site should have been identified as a previously developed site and it ought to have been included as a suitable windfall site for permitted development.

27. The LAN005 site is extremely well positioned to take advantage of the HS1 train station at Martin Mill with its direct and regular commuter services into both Dover and London since it lies less than one kilometre from Martin Mill station via a rural footpath directly adjacent to its southern boundary. Yet the Council does not appear to have even taken the proximity of Martin Mill station into account when assessing the overall sustainability score for the village of East Langdon. Instead, the Council appears to have only considered the infrequent no.93 bus service when considering the public transport score for the village of East Langdon. In ignoring the significant public transport resource available in the neighbouring village of Martin Mill, the Council has therefore used flawed methodology in assessing a score of only 10 for East Langdon.

28. The inconsistency in the Council's approach can also be seen in what they publicly state elsewhere in their Draft Local Plan Reg 18 submissions, for example:

(i) At para 6.85 *In accordance with the NPPF and associated guidance it is important that policies allow for suitable development opportunities for windfall housing to come forward during the Plan period in sustainable locations, within or immediately adjoining the built confines of settlements which have a reasonable range of facilities. In doing so it is important that the scale and quantity of such windfall developments should always be in proportion to the size of the settlement and the range of services and community facilities it offers at the time. Such an approach acknowledges that new housing can help rural communities retain existing services, such as public transport routes, retail and educational facilities. In Districts such as Dover where the countryside is characterised by groups of smaller settlements, development in one village may also support the viability of services in another village close by...*

(ii) At paragraph 6.78

*As part of the evidence base for this Plan the Council has undertaken a review of its Settlement Hierarchy. ..The majority of the remaining rural settlements are villages and hamlets, many with Conservation Areas at their core. These villages and hamlets are considered suitable in principle for windfall development of appropriate scale, taking account of the cumulative impact of any allocated sites and other developments with planning permission within the settlement. **In the larger of these villages, windfall development will be acceptable in principle within or immediately adjoining the settlement boundaries.**"*

(Emphasis added)

29. Appendix 1 of the RSHP identifies East Langdon as a larger village, which means that windfall development ought to be acceptable in principle *in or adjoining the settlement boundaries* of the village. Again, the LAN005 site ought to have been identified as suitable and sustainable within or adjoining the correctly drawn settlement boundary of East Langdon, had the Council followed their own published policies.

30. The Council has also been inconsistent in its use of heritage concerns when dealing with planning applications in East Langdon. Eastside Farm is Grade II listed with its associated dwellings (the Brick Barn and Old Stables) being curtilage listed. The farmhouse itself has

been granted permission in the last few years for significant changes including the construction of a swimming pool in its garden together with ancillary structures (21/01192), and the grant of permission to the Brick Barn for the erection of a substantial separate building in its garden for the stated purpose of housing a poker table (20/00174). Yet the Council has cited Eastside Farm heritage concerns in order to reject the development of the LAN005 site, even though geographically this site is situated much further away from Eastside farmhouse.

31. This is all the more surprising given the views of Cornwallis Rumley¹³ the heritage experts appointed by Mr Woodward in Appeal reference APP/X2220/W/23/3314961 who state, “*The effect of the proposed development upon these [heritage] assets is limited*” in respect of Eastside Farm and “*extremely limited*” in respect of Jossenblock which is Grade II* listed. Cornwallis Rumley state at §1.5 of their report, “*The proposed units express a variety of traditional vernacular materials, shapes, scale and massing which the existing immediate dwellings do not possess. Such a development can only bring prestige to the village.*”

32. Mr Davies in appeal reference APP/X2220/W/23/3314961 acknowledges in para 23 of his reasons that any harm “*to the heritage assets would be less than substantial.*”

33. The Council has a statutory obligation to maintain an accurate brownfield register¹⁴ and to make effective use of land as set out in the NPPF. Paragraphs 119 and 120 of NPPF require sustainable development on suitable brownfield and derelict sites in preference to greenfield sites. DDC has failed to fulfil its statutory obligations in this respect. It has not identified any *previously developed land and vacant areas within settlement boundaries* of East Langdon such as LAN005. This is a breach of both the Town and Country Planning (Brownfield Land Register) Regulations 2017, para 6.84 of DDC’s Draft Local Plan Reg 18 submission quoted above, and paras 119 and 120 of the NPPF.

34. It is certainly not sound policy to wrongly manipulate and improperly draw the settlement boundaries of East Langdon in order to exclude certain “*traditional rural buildings [that have been] converted to residential use that are connected to the main body of the settlement, together with their residential curtilages*” including their gardens and associated land¹⁵, as these properties are by definition previously developed sites within the existing village footprint of East Langdon in accordance with the Court of Appeal’s Dartford Borough Council case referred to in footnote 15 below.

35. The Council should not be allowed to use unparticularised “heritage” concerns when assessing the suitability of proposed sites for development in their Draft Local Plan especially when they have adopted such an inconsistent approach to heritage when dealing with previous planning applications. Allowing consent for the further suburbanisation of Eastside Farmhouse’s garden by allowing the erection of a swimming pool and associated structures, is entirely inconsistent with the suggestion that the development of the LAN005 site for

¹³ Cornwallis Rumley are also the Heritage and Archaeological consultants appointed by the Royal Household to advise in relation to maintenance and repairs to Grade I palaces in London.

¹⁴ Pursuant to reg. 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017

¹⁵ The case of Dartford Borough Council v Secretary of State for Communities and Local Government [2017] EWCA Civ. 14 confirms that a former garden that is not in a built-up area falls within the NPPF’s definition of previously developed land. The land attached to the former commercial workshop is either derelict land or akin to garden as it was last used by Mr Woodward over 14 years ago to graze his daughter’s horse and is now entirely redundant.

housing would adversely impact the setting of this heritage asset. This is especially the case where the LAN005 site cannot even be seen from the Village Green, Eastside Farmhouse or Jossenblock and the original listing of Eastside Farm only mentions features of the building itself and not its setting.

36. In any event, the LAN005 site was originally part of Jossenblock not Eastside Farm and remained so until the 20th Century. The site appears to have originally formed part of Jossenblock's garden or orchard at one stage as indicated in the Cornwallis Rumley report so was never part of the setting of Eastside Farm.

Summary

In relation to the Inspectors questions:

Q5 on page 6. “How were suitable and potentially suitable housing sites determined for the purposes of the SA? What type of sites were discounted as part of this process?”

The Council has published but not followed its own SA criteria and as a result it has discounted sites that would be more suitable and sustainable, contrary to law.

Q7 on page 6. “Is the SA based on a robust and up-to-date assessment of housing and employment sites? Were adequate reasonable alternative options considered and were they tested on a consistent basis?”

The Council's SA is neither robust nor up to date. The SA is flawed since it does not identify more suitable sustainable sites in the District as the Council has:

- (i) improperly manipulated settlement boundaries certainly in the village of East Langdon to prevent development contrary to the NPPF;
- (ii) not maintained an accurate brownfield register contrary to Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017;
- (iii) failed to properly attribute sustainability scores by not taking into account facilities in “another village close by” contrary to para 6.85 of the Council's Reg 18 submission, as it has failed to acknowledge the significance of the HS1 station at Martin Mill to East Langdon;
- (iv) failed to adopt a consistent pro-active approach as required by paras 38, 119, 120 and 121 of the NPPF, to identify alternative more suitable sites for development in the village of East Langdon.

The Council ought to be required to reconsider its Draft Local Plan and to consistently apply both its own published criteria as well as the NPPF, which would require it to certainly include the LAN005 site for windfall development in the village of East Langdon for up to 10 dwellings.

Annex 1

In the matter of Dover District Council's call for potential Sites pursuant to their Strategic Housing Land Availability Assessment due on or before 30 April 2019.

Re: land situated at Eastside Farm East Langdon Kent CT15 5JF identified on the attached plan edged in blue running to approximately one acre ("the Land") which the Owner proposes should be included as an allocated site for a new housing development.

The proposed site to be allocated is within 300 meters of the West Side bus stop on The Street, East Langdon, which is served by Bus 93 and benefits from services to Dover City Centre. The site is also approximately 1km to Martin Mill train station, which benefits from frequent services between Faversham and London including Waterloo, London Bridge and Charing Cross. Both these distances are commensurate with the general guidelines detailed within the Institution of Highways and Transportation 'Providing for Journeys on Foot' guidance, which is used by practitioners and therefore the proposed site is considered well served by public transport and a sustainable location for residential dwellings.

The site also has good access to Langdon Primary School, Langdon Playing Fields and the village of Martin Mill, which adds to its sustainable location.

The land is flat in nature and is within flood zone 1 and is not therefore affected by sources of flooding. Indeed, there are no known geographical or contamination constraints that would prevent the Land being developed for residential use.

Access to the land is within single ownership and the current entrance already ensures clear visibility on to the road that runs to the east of the village Green. As a result, there are no known physical barriers to development.

Although the Land currently lies outside the defined confines of the village of East Langdon, there is no geographical or logical reason why it should not be considered part of the village and formally brought within the confines of the village. Indeed, the exclusion of the land from the development boundary is something of an anomaly since Eastside Farm was one of the original four farms that formed the village of East Langdon. The other farms were Church Farm, Jossenblock and Westside Farm. As a result, there is no logical or historical reason why the Land should not be considered as part of and therefore included within the confines of the village itself.

As such it ought to be looked upon favourably as appropriate village infilling in accordance with the Ministry of Housing National Planning Policy Framework ("NPPF") published in February 2019, paragraph 84 of which provides as follows,

"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling

or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

The Land was originally part of Eastside Farm which has not been used as a Farm for many years and has no agricultural value. In addition to the Farmhouse¹, which has been within residential use for over 30 years, the Brick Barn² and the Old Stable Block³ have also been lawfully converted into residential use in recent years, and has therefore established the principle of C3 residential use in this location despite all buildings falling outside the current settlement boundary. Furthermore, this change in use has also left the Land in question, redundant.

In addition to the established residential use on part of the land and buildings, the land also includes a former workshop (Use Class B8) that can be seen in the top left-hand corner of the Land shown on the attached planning map (orientated north), which recently became redundant after the Owner’s company using this facility was wound up this year. Under Schedule 2, Part 3, Class P of the GDPO, this unit benefits from Permitted Change of Use from B8 to C3, which further establishes residential use in this location. To this end, the Land itself is a brownfield site, which is given preferential treatment when considering locations for development.

Whilst Eastside Farmhouse is a Grade II listed building, the listing description only discusses specific features of the building itself and does not mention the setting as a reason for its heritage importance. Indeed, the recent works to the former outbuildings and the development of the workshop after the property was listed indicates that the setting of the building was not considered important at the time of the planning permissions. Notwithstanding this, the land in question sits outside the Farmhouse curtilage and is on the other side of the modern extensions and as such it is therefore considered that the Land does not contribute towards this listed building’s setting in any event.

The proposed site resides within the East Langdon Conservation Area, however there is no character appraisal against which to assess this site. However, the site owes more to the urban edge of East Langdon than to the countryside as the attached Google Maps image demonstrates. Indeed, the neighbouring land has a much more clearly defined defensible boundary than the proposed site, which is clearly part of the surrounding buildings and outhouses and therefore susceptible to development. In this context there would be little harm through the loss of unused paddocks, but this would have negligible impact on the Conservation Area as the wider landscape would be almost untouched. In this respect, there is some comfort in the Appeal Decision at Dover Road in Deal (ref: APP/X2220/W/17/3183959), which has similar characteristics to the proposed site.

Eastside Farm and its neighbouring properties have recent planning history of consequence to this application. In a planning appeal as long ago as July 1991 relating to the proposed development of the Old Stables (Appeal ref T/APP/X2220/E/90/807181-4/P7 & T/APP/X2220/A/90/173130-3/P7) the Inspector noted that *“the increased residential use of the surroundings of the Farmhouse would be an appropriate form of development within the village”*.

¹ Land registry title TT54263 on the attached Title number K510781

² Land registry title TT47276 on the attached Title number K510781

³ Marked X on the attached Title number K510781

We would also highlight the neighbouring Church Farm Mews⁴, which was successfully developed in 2005 for the building of 9 residential dwellings (05/014442) so there is relevant precedent for local redundant land being used to create new housing within the village.

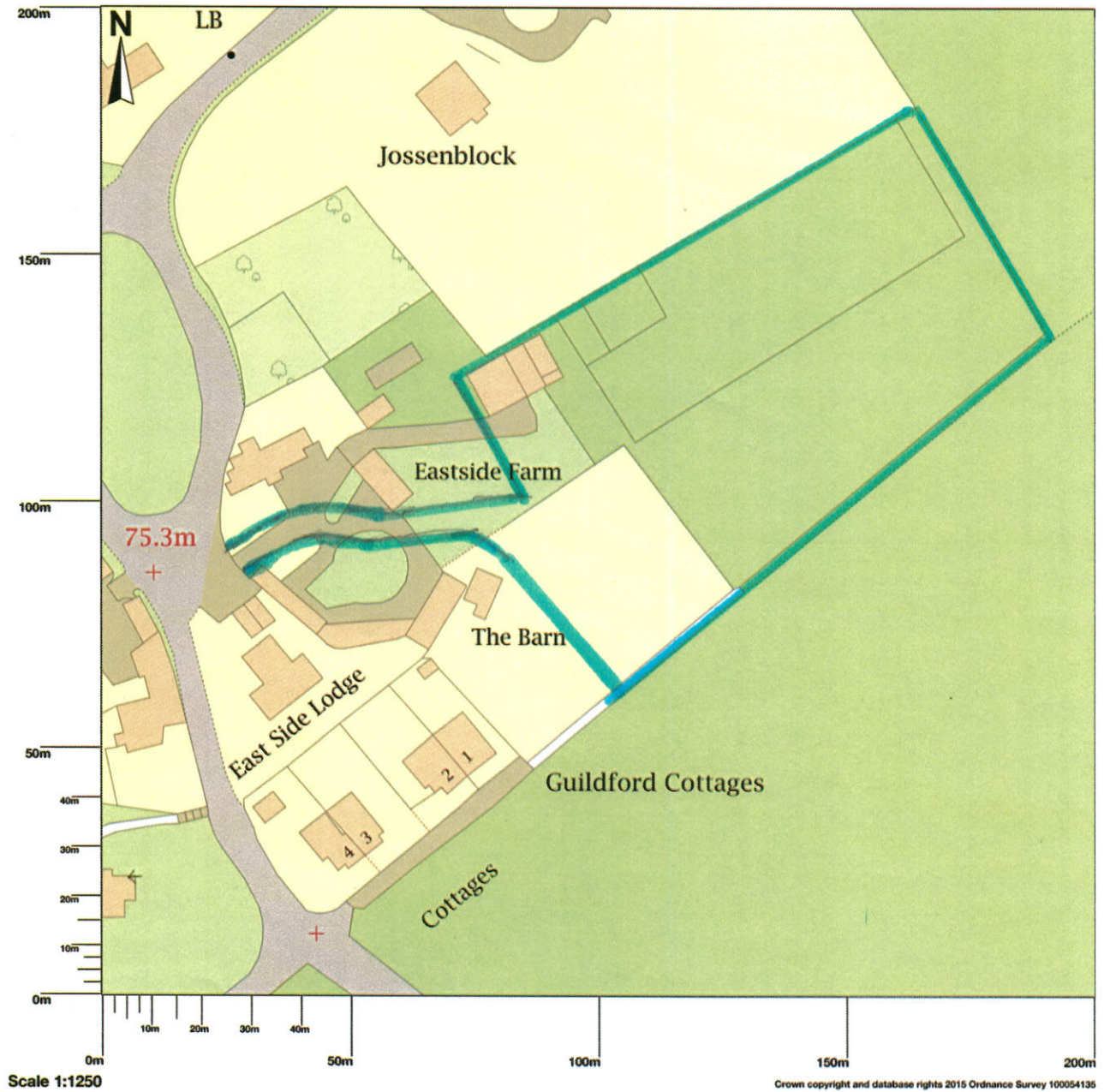
In relation to rural development paragraph 78 of the NPPF adds,

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive...”

As demonstrated the Land is available, deliverable and viable for development and it ought to be included as an approved site for new homes and should be allocated for development for up to 10 new homes.

⁴ Identified on the attached Google Map

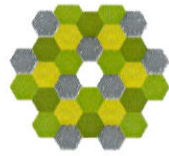
Land at Eastside Farm



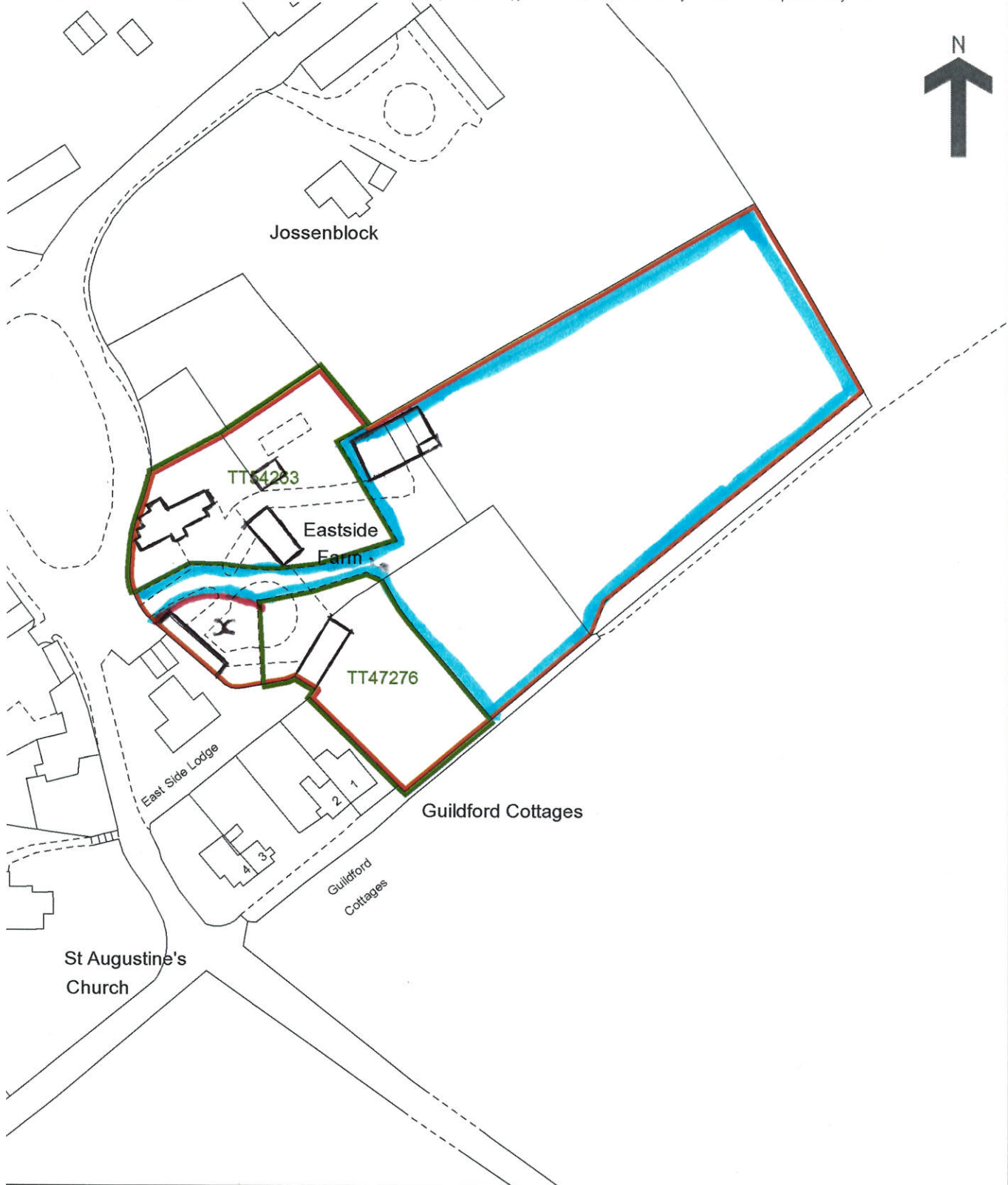
Map area bounded by: 633309,145962 633509,146162. Produced on 16 April 2019 from the OS National Geographic Database. Reproduction in whole or part is prohibited without the prior permission of Ordnance Survey. © Crown copyright 2019. Supplied by UKPlanningMaps.com a licensed OS partner (100054135). Unique plan reference: p4buk/339639/461808

HM Land Registry Current title plan

Title number **K510781**
Ordnance Survey map reference **TR3346SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Kent : Dover**



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