

Dover District Local Plan Examination

Hearing Day 2 – Wednesday 15th November 2023

Matter 2 – Housing Growth and Residential Windfall Development

**Local Housing Need, Settlement Hierarchy, Housing Distribution,
Site Selection Methodology and Residential Windfall Development**

**Hearing Statement on behalf of Pentland Homes Ltd. in respect of
the omission of Land at Monkton Court Lane, Eythorne.**



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Appendix 1 – Flood Risk Assessment & Drainage Impact Assessment

1. Introduction

These representations are submitted on behalf of Pentland Homes Ltd. (Pentland).

Pentland object to the removal of land at Monkton Court Lane, Eythorne, as a residential allocation, in the Submission Local Plan.

Dover District Council published the Regulation 18 Local Plan on the 20th January 2021.

The Regulation 18 Local Plan identified 'Land at Monkton Court Lane, Eythorne as a residential allocation, with estimated capacity of 20 dwellings' by Policy EYT001. (The Site)

The reason given for the site allocation was;

"Eythorne and Elvington are currently identified as villages in Policy CP1 of the Core Strategy (2010). However, the recent Settlement Hierarchy Review conducted by the Council shows that both these settlements score well in relation to the number of services and facilities provided. Given this, as part of the Council's strategy for the rural area it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District. EYT001, EYT008 and EYT019 have also been identified as suitable sites in the HELAA that would provide a logical extension to the existing settlement and are also proposed as housing allocations in line with the housing growth strategy."

The Regulation 19 Submission Local Plan was published for public consultation for 7 weeks from the 21st of October to the 9th of December 2022.

The site was removed from the Regulation 19 Local Plan.

The sole reason given was;

"EYT001 – Land at Monkton Court Lane. Site was proposed for 20 units. The site is covered by a surface water flow path which constrains development here so has been removed."

No detailed evidence was given to justify the removal of the site.

2. Housing Growth

Policy HP3 makes provision for the delivery of 'at least' 10,998 net additional dwellings in the plan period up to 2040. The additional dwellings will be delivered through a combination of existing commitments, site allocations and suitable windfall developments.

Dover and Whitfield are proposed to deliver the majority of new residential development, together with the District Centres of Deal, Sandwich and Aylesham.

'Eythorne and Elvington' (et al) are identified as a 'local Centre'.

Paragraph 4.212 states;

"All these villages [including Eythorne and Elvington] play a role as local centres, serving the needs of their own residents and those of adjoining small villages and hamlets. They have a very good range of services and facilities. Each of these Local Centres has a primary school, a local food store, a pub and Post Office facilities."

Paragraph 4.213 states;

"To help sustain and strengthen the role of these local centres, additional housing over the lifetime of this Plan is considered appropriate".

Consequently, the Local Plan proposes 3 site allocations at Eythorne and Elvington, SAP 28, 29 and 30 to deliver approximately 355 dwellings.

Furthermore, Policy SP4 permits additional 'windfall' development '...immediately adjoining the settlement boundaries of....Eythorne'.

It is clear, therefore, that the allocation of an additional 20 dwellings on land at Monkton Court Lane, would be entirely consistent with the strategic approach of the Local Plan.

3. Technical Constraints

As previously stated, the only reason given by the Council for the removal of the site from the Regulation 19 Local Plan was;

"The site is covered by a surface water flow path which constrains development here so has been removed."

The Council have not put forward any technical evidence to support their assumption.

However, the site promoters, Pentland, have commissioned a Flood Risk Assessment and Drainage impact Assessment of the site, which is appended to this statement (Appendix 1).

The report concludes;

"It is proposed to construct 20 new dwellings on this greenfield site with associated accesses and hard standings. Surface water will be discharged to a series of swales and soakaways on the site. The main flood risks are assessed to be from overland flow from land to the rear of the site, and exceedance of the on-site sewer systems. Construction of a cut-off drain along the eastern boundary and regular maintenance of this and the other soakaways on the site should result in a low residual risk of these events happening. No additional flood risk will be created off-site, and indeed the development may contribute some betterment to the situation. It is concluded therefore that the site can be satisfactorily drained and maintained flood free."

Pentland submit that there are no technical constraints which restrict the development of the site for residential development.

4. Conclusions

Additional residential development at Eythorne fully accords with the strategic approach of the Local Plan.

Eythorne is a sustainable location for development and the proposal constitutes 'Sustainable Development'.

The site immediately adjoins the settlement boundary and is of a scale which can deliver open market and affordable housing relatively quickly. Development will not adversely impact adjoining properties or the surrounding countryside.

The site promoters, Pentland, have demonstrated that there are no technical constraints which restrict residential development on the site and there is no evidence to support the sole reason given by the Council for the removal of the site from the submitted Local Plan. Pentlands 'Flood Risk Assessment and Drainage Impact Assessment' clearly concludes that the site can be developed for residential development and "...can be satisfactorily drained and maintained flood free".

5. Proposed Change

It is requested that the site be reinstated as a residential allocation as follows;

“Land at Monkton Court Lane, Eythorne, as shown on the Policies map, is allocated for an indicative capacity of 20 dwellings. Development must meet the following criteria;

- A landscape buffer shall be provided on the Southern boundary to screen the development from the wider countryside,
- Primary vehicular, pedestrian and cycle access shall be provided from Monkton Court Lane,
- A Transport Statement is required in accordance with Policy T12, to identify any additional off site highway improvements and sustainable transport measures that are necessary to serve the development,
- A site specific Flood Risk Assessment is required to address the issue of surface water flooding and consider the impact of climate change over the lifetime of the development,
- Due to the scale of the development this site should provide enhancements to Open space and Community facilities through off-site contributions.”