

EXAMINATION INTO THE DOVER NEW LOCAL PLAN TO 2040

Response to the Inspectors Matters, Issue and Questions (MIQs)

Matter 2 – Housing Growth and Residential Windfall Development

Land on the South West side of Hillside Road, Dover

On behalf of Glen Virtue Properties

Original Representation: 479

Original Site Reference: DOV011/TC4S100

Prepared by:

Danielle Dunn BSc (Hons) MSc. MRTPI

ISSUE DATE / REVISION	COPY REVIEWED BY	DATE COPY HAS BEEN REVIEWED
02.10.2023	BY	02.10.2023

Date: 4th October 2023
Job Ref: P.22.009.3164



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Matter 2 – Housing Growth and Residential Windfall Development

Issue 1- Local Housing Need and the Housing Requirement – Policy SP3

Q1 What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

1. In accordance with the Housing Topic Paper, paragraph 3.3 (March 2023) (**HEB02**), by applying the Government’s standard method, the objectively assessed housing need figure for the Dover District, on which the Plan has been based, is 611 dwellings per annum (dpa) which equates to providing a minimum of 10,998 dwellings over the plan period.
2. The current allocations set out in the plan delivers a housing number of 6642. Which is short of the target number of dwellings by 4356 units required by the objectively set housing need. The current Local Plan is relying on the committed supply to make-up the shortfall, through extant permissions, neighbourhood plan allocations and sites subject to S106 since 2022. It seems there is a level of risk in delivery of the objectively assessed housing need with so few residential development sites being allocated in the plan.
3. In accordance with paragraph 60 of the NPPF, it is important that “*a sufficient amount and variety of land can come forward where it is needed*”. Furthermore, at paragraph 69 it is identified that “*small and medium sized sites can make an important contribution to meeting the housing requirement of an area.*”
4. In this instance it is offered that the site at Hillside Road in Dover, could come forward as a small site allocation in the Local Plan. The site is available and could be delivered quickly and in accordance with the requirements for a five year land supply of ‘developable’ ‘deliverable’ sites (NPPF, paragraphs 68 and 75).
5. In accordance with the NPPF glossary, the definition of deliverable and developable are as follows:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.

6. The site at Hillside Road, could be delivered within 5 years of the Local Plan being adopted, by way of pre-app, outline, reserved matters and discharging any conditions, well within the timeframe. It would also offer an alternative site, enabling an improved mix of sites in the Local Plan area. In the first instance the site is promoted for 10-15 units which could contribute to the housing land supply of Dover.

Issue 3 – Housing Distribution - Policy SP3

Q1 Having established a settlement hierarchy, what process did the Council follow to determine the distribution of new development? Was this process robust and based on reasonable judgements about where to direct new development?

7. The town of Dover is the principal town of the Dover District and forms the main focus for new development. Paragraph 4.52 of the submission Local Plan (**SD01**) states “*The Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield, where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create a new neighbourhood with supporting infrastructure*”.
8. The site at Hillside Road should be considered for inclusion in the Local Plan due to its sustainable location within the centre of Dover. It has access to sustainable transport links, health services and community and shopping facilities, all of which are within a walking distance. Furthermore, the site is not subject to any national designations and it has a history of being considered suitable for residential development (see paragraph 8 below).
9. The SAP13 Small Dover Sites policy, clearly identifies that there is a spatial spread of small sites across the whole town of Dover and the non-inclusion of the site at Hillside Road seems to have gone against this assessment of sites and their distribution. It seems unsound that the site at Hillside Road was denied the opportunity for a Sustainability Assessment, especially as it is well located in the principal town of the district as advocated by the Local Plan itself.
10. The site at Hillside Road has previously had an outline planning permission granted for 28 dwellings (87/00081), which included 8 semi-detached, 19 terraced and one detached dwelling, which was never considered as part of any assessment of the site. The original decision notice and plans are reproduced at Appendix 1.
11. More recently, two applications have been approved in Hillside Road, 22/01707, which granted permission for 3 dwellings with associated landscaping and parking and a single

attached dwelling was granted under application 21/01641, which directly adjoined the Hillside Road, Dover site.

12. Although these applications were determined against the current adopted development plan. The case officer report did identify that that *“The National Planning Policy Framework seeks to direct development towards sustainable locations”* and the sites were *“sustainable development commensurate with the existing settlement within or immediately adjoining the settlement boundaries of Dover”*.

Q3 Table 12 in the Council’s Housing Topic Paper¹² states that, combined, almost 50% of all new housing will occur in Dover and at Whitfield. When considering the acknowledged viability challenges around Dover, and the strategic size and scale of the Whitfield Urban Expansion, is the distribution of development justified?

13. As promoters of a central Dover site, we consider that the site is well located within the built-up area of Dover. The apportionment of sites towards the Dover area and at Whitfield is based on sound planning, based on the ambitions of sustainable development advocated by the NPPF. By directing development towards the most sustainable settlements, future occupiers will be able to access the services and public transport networks within the existing settlement.
14. Previous planning permission has been granted adjoining the Hillside Road site, for a single unit (21/01641). It was assessed at the time of the application by the case officer who commented that the site was well placed within the town, that there was no requirement to provide for parking as any future occupiers would be able to easily access public transport.

Q7 *Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, as required by paragraph 69 of the Framework? Does this include sites which have already been completed?*

15. Paragraph 69(a) of the NPPF sets out that local planning authorities should: *“identify, though the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on site no larger than one hectare”*. The submission Local Plan currently has an objectively assessed housing need of 10998 dwellings, so in order to meet the requirements of paragraph 69, which requires 10% of the housing requirement

to be on sites less than 1 hectare, 1100 dwellings on small sites should be provided to meet this target. Calculations are provided at Appendix 2 to this response, which show only 516 dwellings are provided on small sets of less than 1 hectare.

16. The site at Hillside Road is 0.87ha, smaller than the prerequisite one hectare as proposed by the NPPF at paragraph 69. On this basis, it is considered that the site would provide a positive addition to the site allocations within the Dover Local Plan, which would in turn enable the LPA to meet the 10% target of smaller sites. It would be a welcome addition to the Dover Small Sites policy SAP13, which includes nine sites all under the one hectare threshold.
17. Due to its size and the lack of restrictions to bring the site forward. The site would be available for immediate delivery.
18. A single residential unit is currently under construction on land adjoining the site, and within the ownership of Glen Virtue Properties (21/01641), this property will be completed and delivered to the market within the next year. There is no reason that future units on the site would not meet this deliverability target, being complete and available shortly after the granting of planning permission.

Issue 4 – Site Selection Methodology

Q1 How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

19. The site at Hillside Road was originally put forward for housing development and assessed as part of the Housing and Employment Land Availability Assessment (HELAA). It was later submitted during the original call for sites as potential employment use, including the potential of a care home. Finally, it was submitted as an omission site at the regulation 18 stage.
20. However, the site at Hillside Road, subject to this response, did not make it through the initial sift of the HELAA. Having been given the site reference DOV011, it was discounted as being woodland. Which is incorrect and covered further in our response to Q5 of these

matters.

21. During the 2021 Call for Sites exercise the site was given the reference number TC4S100 and again nothing further with regard to sustainability assessment was undertaken on the site.
22. When considering the methodology and approach set out in Section 5 of the Sustainability Appraisal, it can be seen that the Sustainability Appraisal is unsound and flawed, because it failed to accurately sift the sites based on its own methodology.
23. In addition, it has been advocated throughout our responses that the site would be a welcome addition to the SAP13 small sites policy within the Dover area.

Q2 How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as within the built-up area of Dover?

24. As promoters of the site at Hillside Road, it has been included in each of the submissions of the site to the Council that the site is available for immediate delivery. This has never been taken into account as part of any assessment of the site.
25. The site is currently being promoted for 10-15 dwellings which would make it a useful and important addition to the list of SAP13 - Dover Small Housing Sites policy.
26. Paragraph 69 of the NPPF identifies that small sites make a valuable contribution towards the housing requirement of an area, and it notes that they "...are often built-out relatively quickly. It goes on to say that at least 10% of a districts housing requirement should be provided on sites no larger than 1 hectare. It is proposed that on immediate adoption of the Local Plan, a pre-app for outline consent will be submitted for review by the Local Planning Authority, to ensure that a scheme that everyone is happy with can be delivered in the 5 year land supply timeframe.

Q5 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

27. It is argued that the site selection process was not robust as it did not take into account the site history when assessing suitability. An early assessment of the site history would have helped to provide clear narrative for the site. Which would have given it more reason for further assessment, rather than just being excluded in the initial sift of sites.
28. The site at Hillside Road was a former allotment site that served the dwellings on Hillside Road. It has previously had a granted outline consent for 28 units, which included eight semi-detached, nineteen terraced and one detached dwelling.
29. Discussions with long-standing residents of the properties on Hillside Road has identified the site as allotment gardens as recently as the late 1980s. A site plan from a planning application submitted in 1987 confirms the location of the allotment gardens. See Appendix 3.
30. A series of historical images of the sites, provided at Appendix 4 of this statement shows how the site was previously cleared and not subject to the self-seeded trees currently on the site.
31. The site at Hillside Road was originally put forward for housing development and assessed as part of the Housing and Employment Land Availability Assessment (HELAA). It was later submitted during the original call for sites as potential employment use, including the potential of a care home.
32. However, the site at Hillside Road, subject to this response, did not make it through the initial sift of the HELAA. Having been given the site reference DOV011, it was discounted as being woodland. Which is incorrect and covered further in our response to Matters 1.
33. During the 2021 Call for Sites exercise the site was given the reference number TC4S100 and again nothing further with regard to sustainability assessment was undertaken on the site.
34. Paragraph 5.5 of the SA, sets out why the sites were initially eliminated from the first sift. This included:
 - *Too small to be allocated in the Local Plan – sites with capacity to accommodate less than 5 dwellings;*

- *Entirely covered by national environmental constraints, specifically Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), Ramsar sites, Heritage Coast, ancient woodland and notified safety zones;*
 - *Subject to planning permission (to avoid double counting housing supply);*
 - *Under construction or since built; and/or Contrary to the policies in the NPPF, for example isolated development in the open countryside, including the AONB, with no relationship to established settlements”.*
35. The site at Hillside Road is not too small, it is being promoted to accommodate 10-15 residential units and has the size and capacity to deliver twice as much housing. Potentially in a phased approach.
 36. The site is not subject to national environmental constraints and it is not subject to an existing planning permission. The site is located within the existing built confines of the Dover town settlement and therefore not an isolated form of development.
 37. If the site was removed early from the process because it was originally sifted as part of the HELAA. It still should have been assessed because it was submitted during the call for sites exercise.
 38. Paragraph 5.4 states *“Sites were received during the preparation of the Draft Local Plan and as part of the consultation on the Regulation 18 Local Plan. All site options received were subjected to the same evaluation process, including site options resubmitted with alternative boundaries”.*
 39. Consequently, the site at Hillside Road was missed from the site evaluation process and the process set out in paragraph 5.6 should have been adhered to. *“The remaining sites were subjected to a detailed site suitability assessment considering their physical characteristics, land uses, setting in the landscape and historic environment, accessibility and other environmental constraints such as ecology”.*
 40. Dover District Council has not followed its own methodology as it has not provided a valid reason why the site at Hillside Road has not been considered as a potential inclusion in the Local Plan.

Issue 5 – Residential Windfall Development – Policy SP4

Q2 Policy SP4 permits new residential development within or immediately adjoining the boundary of defined settlements provided that, amongst other things, development is commensurate with the scale of the settlement it adjoins. Is this sufficiently clear enough to be effective?

41. This policy approach for windfall development is supported.

Outline Planning Decision Notice and plans 87/00081.

Appendix 1

TOWN AND COUNTRY PLANNING ACTS

Town and Country Planning Act 1971

Decision to Grant Outline Planning Permission

TO:-

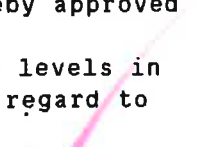
RADNORCLIFFE DEVELOPMENTS LIMITED

North Lane
Sandgate
Folkestone Kent
CT20 3AS

TAKE NOTICE that DOVER DISTRICT COUNCIL, the district planning authority under the Town and Country Planning Acts, has GRANTED OUTLINE PLANNING PERMISSION for

outline - residential development - eight semi-detached, 19 terraced, one detached with garages as referred to in your application received on 27/01/87 as amended by your letter dated 23 July 1987 and accompanying site plan dated 22 July 1987 relating to land rear of Hillside Road, Dover,

SUBJECT TO SUCH CONDITIONS AS ARE SPECIFIED hereunder together with the reasons for their imposition:-

- i) Details relating to the siting, design and external appearance of the proposed buildings hereby approved and the means of access thereto shall be submitted to and approved by the District Planning Authority before any development is commenced.
Reason: No such details have been submitted.
 - ii) Application for approval of the reserved matters referred to in the above condition must be made not later than the expiration of three years beginning with the date of the grant of outline permission.
Reason: In pursuance of Section 42(2) of the Town and Country Planning Act, 1971.
 - iii) The development to which this permission relates must be begun not later than whichever is the later of the following dates:-
 - (a) the expiration of five years from the date of the grant of outline permission; or
 - (b) the expiration of two years from the final approval of the reserved matters or, in the case of approval on different dates the final approval of the last such matter approved.Reason: In pursuance of Section 42(2) of the Town and Country Planning Act, 1971.
 - iv) Plans for the site showing the existing and proposed ground levels and sections of all proposed buildings, including levels of thresholds, shall be submitted to and approved by or on behalf of the District Planning Authority before any part of the development hereby approved is commenced.
Reason: To ensure that the work is carried out at suitable levels in relation to the adjoining properties and highways, having regard to amenity, access, highway and drainage requirements.
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- v) Details of all external materials to be used in the construction of the development hereby approved (including, where appropriate, boundary walls and hard surfaces) shall be submitted to and approved by or on behalf of the District Planning Authority before any development takes place.
Reason: Such details are required to ensure a satisfactory external appearance in the interests of the visual amenities of the locality.
- vi) Details submitted pursuant to condition (i) above shall show adequate sight lines which shall be in the control of the applicant at the junction of the proposed road to the satisfaction of the District Planning Authority, and the approved sight lines shall be provided before the development hereby permitted is completed and the site occupied, and thereafter be maintained to the satisfaction of the District Planning Authority and no structure, tree or plant within the approved sight lines shall exceed 0.9 metres in height.
Reason: In the interests of road safety and the convenience of other road users.
- vii) Details submitted pursuant to condition (i) above shall show adequate sight lines which shall be in the control of the applicant at the junction of the proposed driveways with the estate access road to the satisfaction of the District Planning Authority, and the approved sight lines shall be provided before the development hereby permitted is completed and the site occupied, and thereafter be maintained to the satisfaction of the District Planning Authority and no structure, tree or plant within the approved sight lines shall exceed 0.9 metres in height.
Reason: In the interests of road safety and the convenience of other road users.
- viii) The first 6 metres of the means of access to each of the proposed dwellings shall be at a gradient not exceeding 1 in 12 and shall be so maintained.
Reason: In the interests of road safety and convenience.
- ix) The first 6 metres of the new road shall be at a gradient not exceeding 1 in 33.
Reason: In the interests of road safety and convenience.
- x) The dwellings hereby permitted shall not be occupied until the road or roads serving the development have been constructed, surfaced and drained to the satisfaction of the District Planning Authority.
Reason: To ensure that a satisfactory road access is provided.
- xi) The details submitted pursuant to condition (i) shall show an estate road layout which complies with the standards in the Kent County Council Manual 'The Kent Design Guide'.
Reason: In order to ensure the satisfactory planning of the estate road in the interests of road safety, convenience and amenity of the users of the estate road.
- xii) The development hereby permitted shall be carried out in conformity with a scheme for landscaping, surface and boundary treatments within the site which shall include:-
(a) a detailed survey of all trees, shrubs and hedges on the application site, giving details of all trees having a trunk diameter (at a height above ground level of four feet six inches) of three inches or more, which shall include: nature of species, area of crown spread; height; diameter of trunk and an assessment of condition.
bl;(b) a detailed survey of levels on the site indicating specific features, such as retaining walls, cuttings, embankments, pits, ponds, etc.

- (c) details of the existing trees, shrubs and hedges to be retained.
 - (d) details of new trees, shrubs, hedges and grassed areas to be planted together with details of the species and method of planting to be adopted.
 - (e) details of earthworks to be carried out on the site.
 - (f) details of treatment proposed for all hardened surfaces beyond the limits of the highway.
 - (g) details of walls, fences or other means of enclosure proposed, together with details of materials and construction including gates, openings, copings, bonding, pier arrangement or other adornment, widths and heights.
 - (h) the measures that are to be taken to protect existing new landscaped work, which shall in the case of trees mean adequate staking and guarding.
 - (i) the arrangements to be made for the permanent maintenance of the landscaped areas.
 - (j) the above mentioned scheme for landscaping shall be submitted concurrently with those matters set out in the above condition to the reasonable satisfaction of the District Planning Authority.
- Reason: In the interests of the visual amenities of the area.

- xiii) In the event of any of the trees, shrubs and hedges included in an approved landscaping scheme or any replacement trees, shrubs and hedges being removed or being destroyed or dying or dead within 5 years of planting they shall be replaced within 12 months at the same places by large nursery stock of the same species to the satisfaction of the District Planning Authority.
- Reason: To protect and enhance the visual amenities of the locality.

- xiv) The landscaping scheme including surface and boundary treatments as submitted shall be carried out insofar as it affects individual plots before the dwellings on those plots are first occupied unless otherwise agreed in writing by the District Planning Authority.
- Reason: In the interests of the visual amenities of the locality.

Dated: 10. July 1990

DISTRICT COUNCIL OFFICES
HONEYWOOD ROAD, WHITFIELD
DOVER, KENT CT16 3PG
Tel DOVER (0304) 821199

Signed: R. A. Mason

for Director of Planning and
Technical Services.

**YOUR ATTENTION IS DRAWN TO THE NOTES OVERLEAF/ATTACHED,
AND ANY ACCOMPANYING LETTER(S).**



RADNORCLIFFE DEVELOPMENTS LIMITED

North Lane
Sandgate
Folkestone Kent
CT20 3AS

Contact:
Ext No:
Reply to:
Planning Division
Our Ref:
Your Ref: STD/87/00081
Date:
10/07/90

Application Reference No. **STD/87/00081**

Dear Sir/Madam,

Town and Country Planning Act 1971

**OUTLINE - RESIDENTIAL DEVELOPMENT - EIGHT SEMI-DETACHED, 19 TERRACED, ONE
DETACHED WITH GARAGES
LAND REAR OF HILLSIDE ROAD
DOVER**

In forwarding this formal decision you are advised :-

- a) That this permission does not purport to convey any approval or consent for works to be carried out on the public highway and you must obtain from the Dover District Council, District Council Offices, Honeywood Road, Whitfield, Dover, CT16 3PG permission for any works which may affect the public highways, prior to such works taking place.

Failure to obtain any necessary approval or consent prior to commencing work on the public highway may result in you being charged for any damage to the public highway adjacent to your development.

- b) That this permission does not purport to convey any approval or or consent for works to be carried out to the public sewer, and you must obtain from the Dover District Council, District Council Offices, Honeywood Road, Whitfield, Dover CT16 3PG permission for any works which may affect the public sewer, prior to such works taking place.

Failure to obtain any necessary approval or consent prior to commencing work on the public sewer may result in you being charged for any damage to the public sewer adjacent to your development.

- c) That the proposed road shall be constructed in accordance with the specification of the Kent County Council for the construction of streets and, before the development hereby approved is commenced, detailed plans and sections showing full engineering details of the proposed road, including gradients and method of surface water



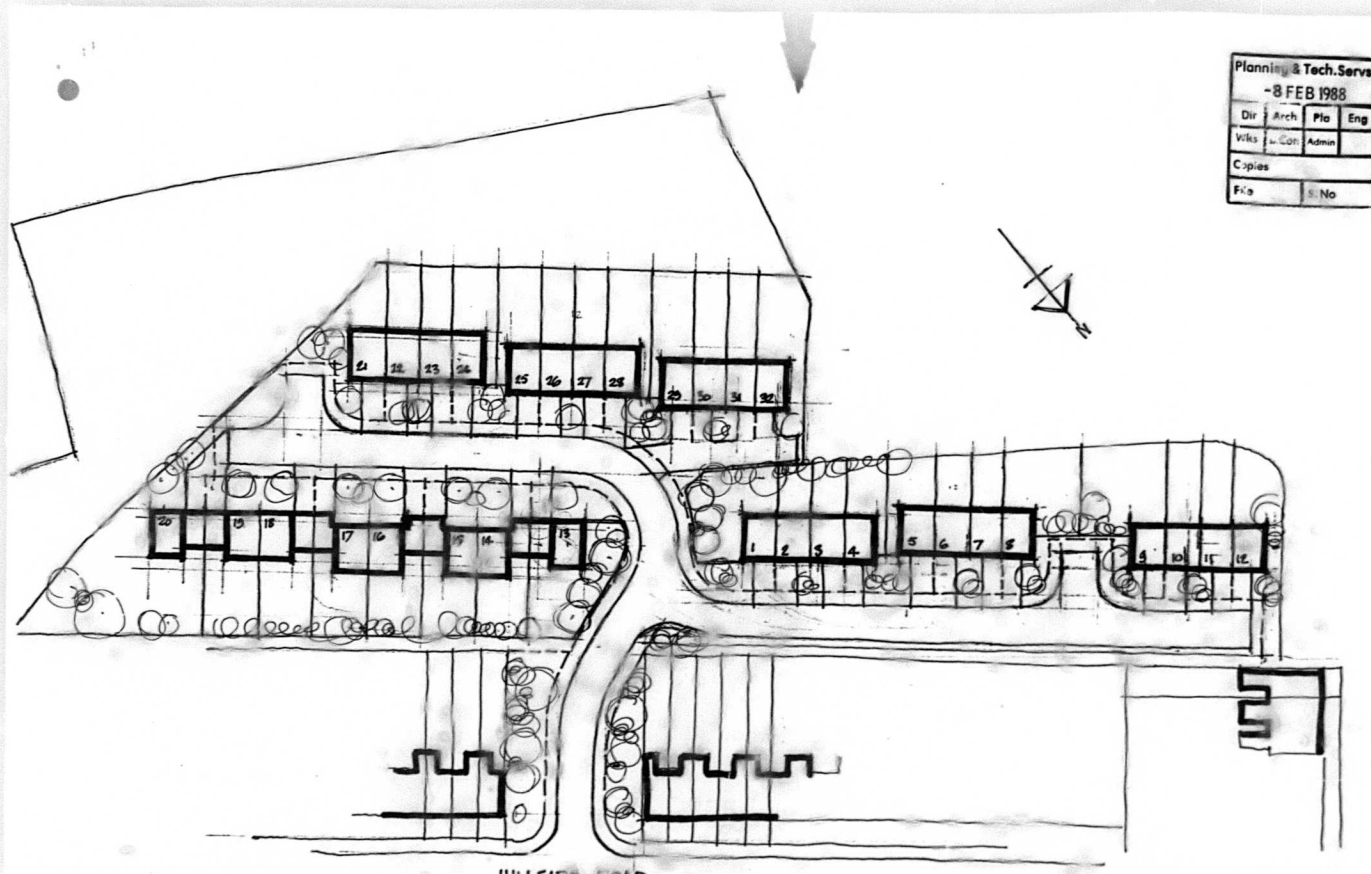
disposal, shall be submitted to and be approved by the Dover District Council, to ensure that the estate road is constructed to an appropriate standard, for the traffic which is likely to use it and to enable the Highway Authority to adopt the highway under the terms of a Section 38 Agreement, Highways Act, 1980.

- d) That in view of the difficulties associated with the access arrangements, a proper detailed engineering drawing is required.
- e) Furthermore, the foul drainage from this site cannot be connected to the S.24 foul sewer at the rear of the properties in Hillside Road. A new off site sewer will be required discharging to the public sewer in Crabble Avenue.
- f) It is also doubtful that the surface water sewer in Hillside Road has sufficient reserve capacity to accept the flow from the site and it is anticipated that either soakaways will be required or another off site sewer.

Yours faithfully,



for Director of Planning and Technical Services.



Planning & Tech. Servs.
- 8 FEB 1988

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SITE LAYOUT PLAN

RESIDENTIAL DEVELOPMENT -
LAND OFF HILLSIDE RD. DOVER
for WALES LAWRENCE HOMES.
date: 1/88 scale: 1:500

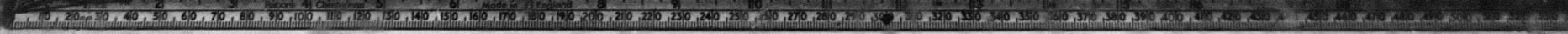
CHENEY & THORPE Chartered Architects
THE TRAMWAY STABLES,
RAMPART ROAD, HYTHE, KENT CT21 5BG.
tel: Hythe (0303) 60515

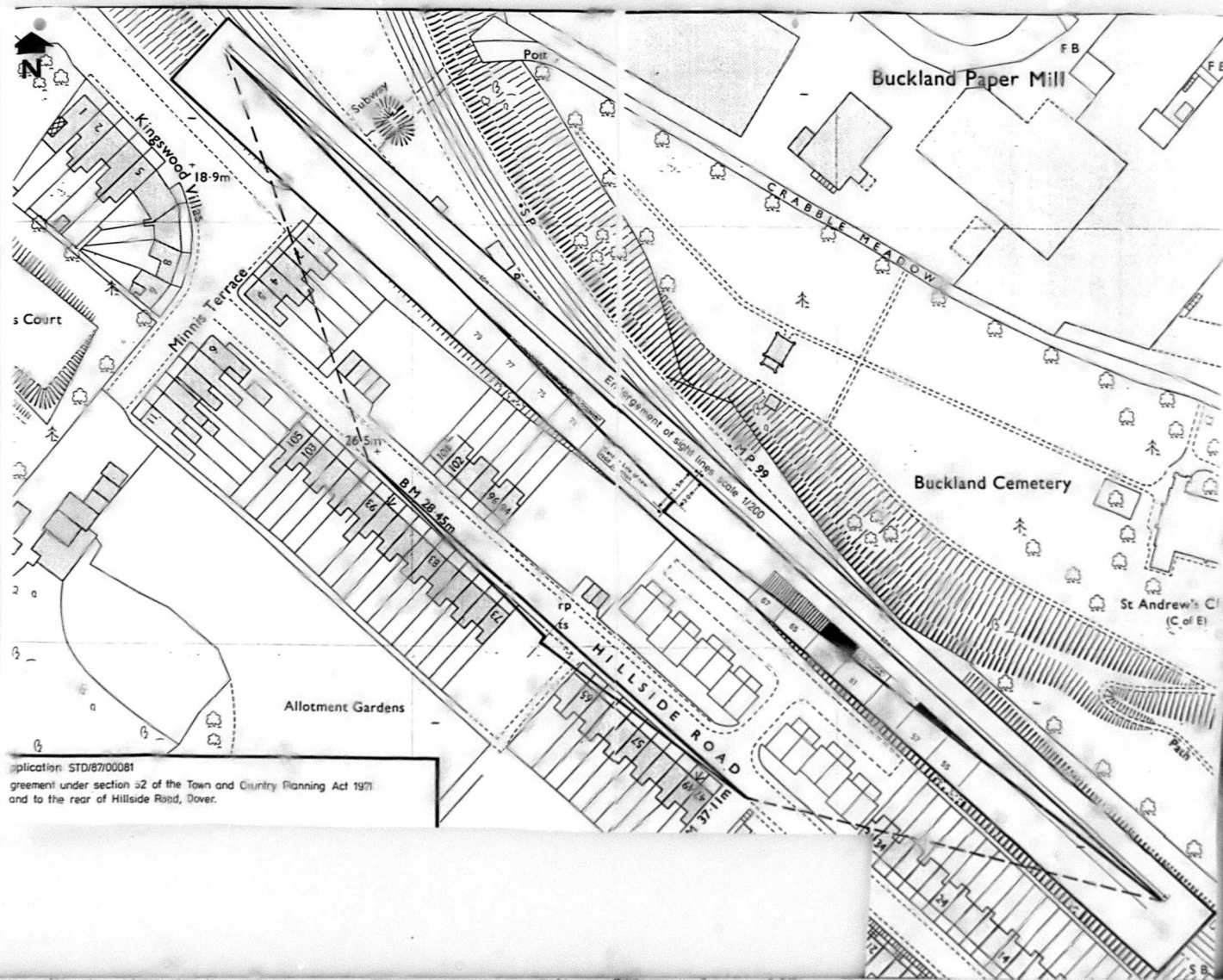
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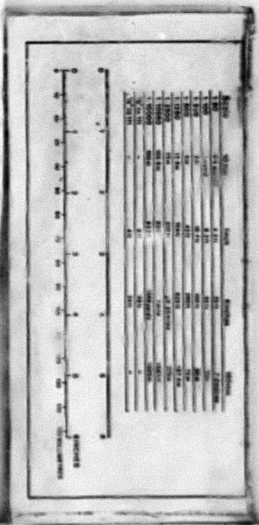
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Application: STD/8700081
 Agreement under section 52 of the Town and Country Planning Act 1971
 and to the rear of Hillside Road, Dover.

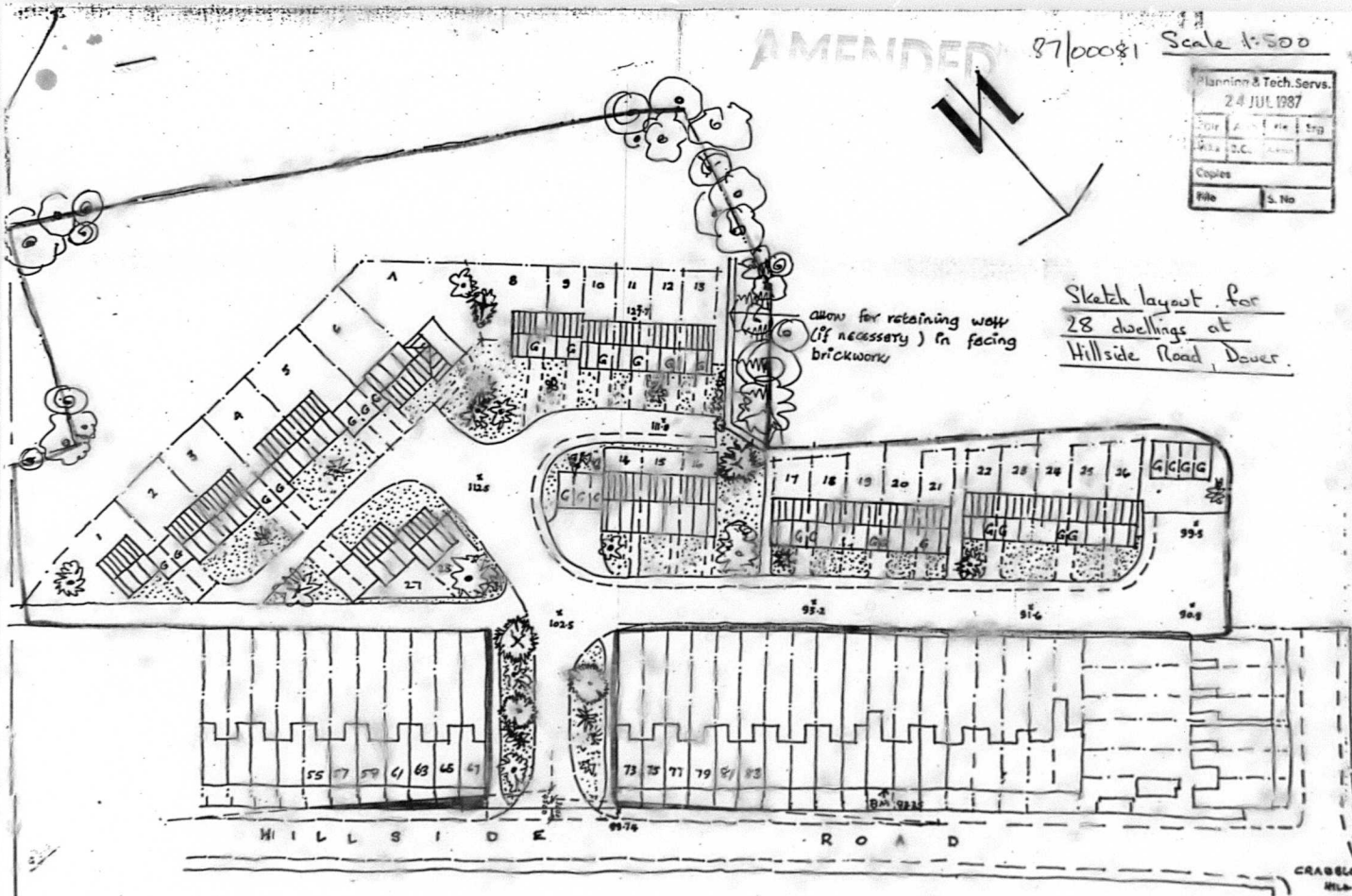


AMENDED

87/00081

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Sketch layout for
28 dwellings at
Hillside Road, Dover.

allow for retaining wall
(if necessary) on facing
brickwork

Revised July 22, 1987.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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Table showing the area of each residential site allocation currently in the Local Plan.

Appendix 2

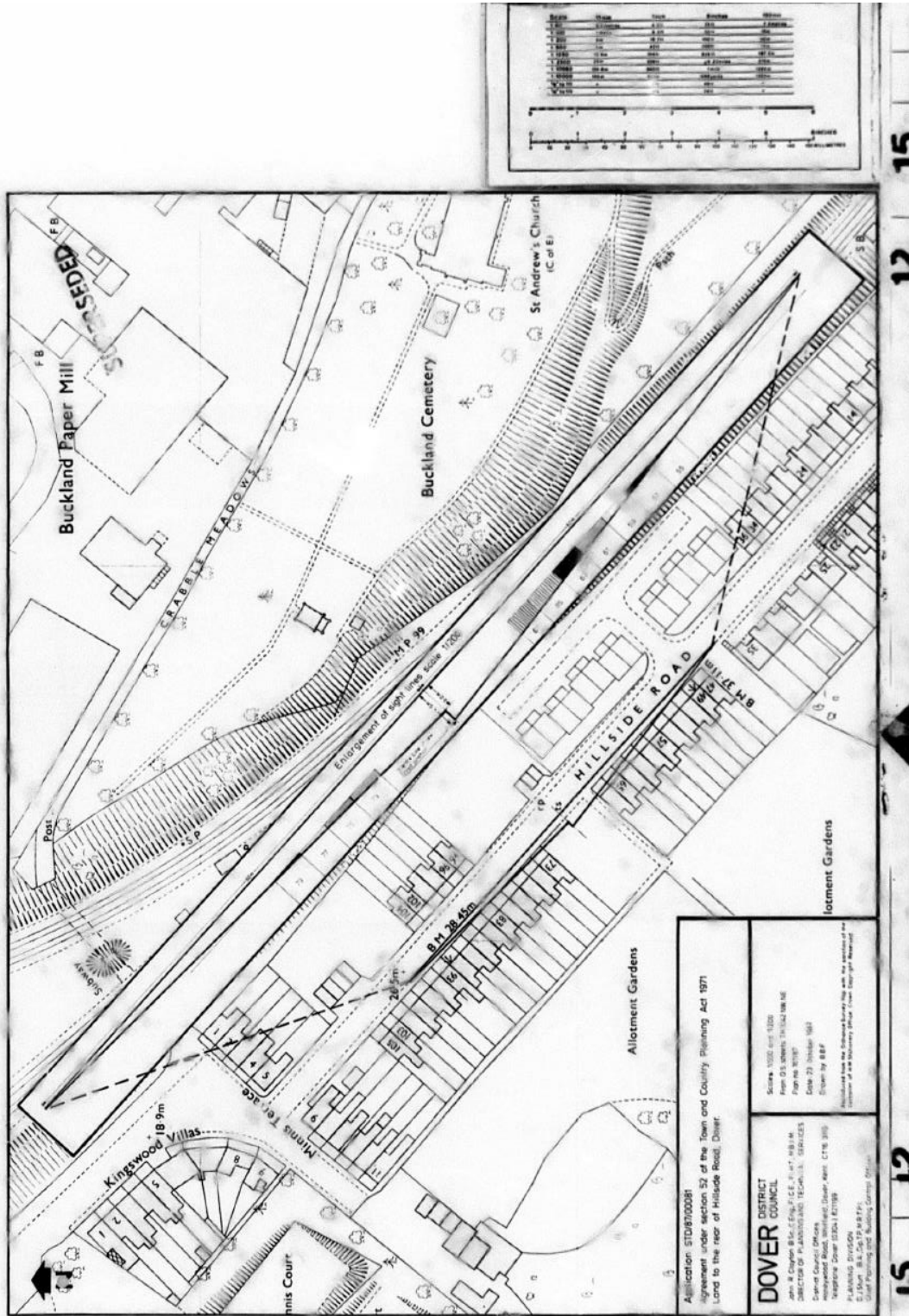
(Figures taken from the SD02 Dover District Local Plan to 2040 - Policies Map October 2022)

Sites less than 1 hectare

Policy	Site	Capacity	Size (Ha)
SAP1	Whitfield Urban Expansion (WHI001 and WHI008)	2,200	382.03
SAP2	White Cliffs Business Park (ELR7 and TC4S120)	Employment	
SAP3	Dover Waterfront (part DOV017)	263	Not available
SAP4	Western Heights	100	Not available
SAP5	Fort Burgoyne (TC4S092/part GUS002)	Employment	
SAP6	Dover Mid Town (DOV018)	100	4.11
SAP7	Bench Street Dover (part DOV017)	100	0.99
SAP8	Land adjacent to the Gas Holder (DOV022B)	80	1.44
SAP9	Land at Barwick Road Industrial Estate (DOV022E)	150	3.69
SAP10	Buckland Paper Mill (DOV023)	135	2.37
SAP11	Westmount College (DOV026)	60	1.94
SAP12	Charlton Shopping Centre (DOV028)	100	0.63
SAP13	Land at Dundedin Drive (South) Dover (DOV006)	8	0.37
SAP13	Land adjoining 455 Folkestone Road, Dover (DOV008)	5	0.34
SAP13	Albany Place Car Park, Dover (DOV019)	15	0.28
SAP13	Land to the north of Coombe Valley Rd, Dover (DOV022C)	20	0.37
SAP13	Land at Durham Hill, Dover (DOV030)	10	0.34
SAP13	Military Road, Dover (TC4S026)	9	0.11
SAP13	Roosevelt Road, Dover (TC4S027)	10	0.22
SAP13	Peverell Road, Dover (TC4S028)	6	0.19
SAP13	Colton Crescent, Dover (TC4S030)	10	0.20
SAP14	Land off Cross Road (DEA008)	100	8.72
SAP15	Land at Rays Bottom (WAL002)	75	4.44
SAP16	Bridleway Riding School, Station Road, Deal (TC4S008)	10	0.77
SAP16	Land to the east of Northbourne Road, Great Mongeham	25	1.09
SAP16	Ethelbert Road garages, Deal (TC4S032)	5	0.09
SAP16	Northwall Road, Deal (TC4S047)	8	0.28
SAP17	Land south of Stonar Lake and to north and east of Stonar 40 Gardens (SAN004)	40	3.30
SAP18	Sandwich Highway Depot (SAN006)	32	2.08
SAP19	Land at Poplar Meadow (SAN007)	35	1.58
SAP20	Woods' Yard (SAN008)	35	0.70
SAP21	Land adjacent to Sandwich Technology School (SAN013)	40	3.43
SAP22	Land at Archers Low Farm (SAN023)	35	2.19
SAP23	Sydney Nursery, Dover Road, Sandwich (SAN019)	10	0.38
SAP24	Land to the South of Aylesham (AYL003)	640	62.88
SAP25	Aylesham Development Area (ELR4) Employment	Employment	
SAP26	Former Snowdown Colliery (ELR14)	Employment	
SAP27	Land at Dorman Avenue North (AYL001)	9	0.31
SAP28	Land between Eythorne and Elvington	300	20.33

SAP29	Land on the south eastern side of Roman Way (EYT008)	50	1.65
SAP30	Chapel Hill Eythorne (TC4S039)	5	0.21
SAP31	Statenborough Farm (TC4S076)	Employment	
SAP32	Land at Buttsole Pond (EAS002)	80	3.93
SAP33	Eastry Court Farm, Eastry (EAS009)	5	0.84
SAP33	Land adjacent to Cross Farm, Eastry (TC4S023)	10	0.44
SAP34	Land at Woodhill Farm (KIN002)	50	3.46
SAP35	Land adjacent Courtlands, Kingsdown (TC4S074)	5	0.71
SAP36	Land to the north and east of St Andrews Gardens and adjacent 50 to Mill House (SHE004/ TC4S082)	50	1.90
SAP37	Land at Botolph Street Farm, Shepherdsweil (SHE006)	10	0.82
SAP37	Land off Mill Lane, Shepherdsweil (SHE008)	10	0.38
SAP38	Land adjacent to Reach Road bordering Reach Court Farm	40	1.78
SAP39	Land to the west of Townsend Farm Road (STM007/ STM008)	36	1.26
SAP40	Land at New Townsend Farm, Station Road, St Margarets 10 (STM006)	10	1.32
SAP40	Land located between Salisbury Road and The Droveaway, St 10 Margarets-at-Cliffe (STM010)	10	2.72
SAP41	Footpath Field (WIN0014)	75	3.59
SAP42	Land adjacent to Staple Road (WIN003)	20	0.83
SAP42	Land adjacent to White Lodge, Preston Hill (WIN004)	8	0.31
SAP43	Land at Short Lane, Alkham (ALK003)	10	0.32
SAP44	Land to the east of Great Cauldham Farm (CAP006)	70	4.02
SAP45	Longships, Cauldham Lane, Capel-le-Ferne (CAP009)	10	0.49
SAP45	10 Land known as the former Archway Filling Station, New Dover 10 Road, Capel-le-Ferne (CAP011)	10	0.66
SAP45	Land at Cauldham Lane, Capel-le-Ferne (CAP013)	5	0.76
SAP46	Land adjacent Langdon Court Bungalow (LAN003)	40	4.68
SAP47	Land adjacent to Lydden Court Farm (LYD003)	30	1.95
SAP48	Apple Tree Farm and north west of Apple Tree Farm	65	4.38
SAP49	Land to the east of Jubilee Road, Worth (WOR006)	10	0.56
SAP49	Land to the East of former Bisley Nursery, The Street, Worth 15 (WOR009)	15	0.83
SAP50	SAP50 Land adjacent to Short Street, Chillenden (GOO006)	5	1.02
SAP51	Land opposite the Conifers, Coldred (SHE013)	5	0.83
SAP52	Prima Windows (NON006)	35	1.19
SAP53	Land at Ringwoud Alpines, Dover Road, Ringwoud (RIN002 and 10 RIN004)	10	1.23
SAP54	Land at Durlock Road, Staple (STA004)	3	0.24
SAP55	Beacon Lane Nursery, Beacon Lane, Woodnesborough 5 (WOO005)	5	0.73
SAP55	Land south of Sandwich Road, Woodnesborough (WOO006)	10	1.26

Copy of site plan submitted, showing allotment gardens, under application Reference 87/00081.



Google Earth Aerial Photographs:

Appendix 4

December 1940:



December 1960:



December 1990:

