
Examination Statement

Land at Botolph Street Farm, Shepherdswell

Dover District Council Local plan
Examination in Public

Matter 3: Housing Allocations

Examination Statement

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1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Church Commissioners for England (CCE). CCE is the landowner and sole promoter of the Land at Botolph Street Farm, (identified as Site reference SHE006; identified in the emerging Local Plan under Draft Policy SAP37). The allocation of SHE006 is supported.
- 1.2. Prior to the submission of the emerging Local Plan by Dover District Council (DDC) to the Planning Inspectorate for examination, CCE and the consultant team have participated in the formal consultation of the emerging Local Plan at Regulation 18 (R18) (January 2021) and Regulation 19 (R19) stages (October-December 2022). Technical documents and a vision document were submitted alongside the R19 representations. The representations to these consultations should be read alongside this Hearing Statement, supporting the allocation of Site SHE006 and providing specific comments on the allocation policy (SAP37) including the availability of additional land to the southwest of the allocated site.
- 1.3. The location of Site SHE006, its surroundings and the vision for Site SHE006 have been set out in detail at the R19 Stage and have not been reproduced in detail in this statement.

2. Response to the Inspectors Questions

Matter 3 - Housing Allocations

Issue 5: Eastry and Shepherdswell Housing Sites (SAP37 – Shepherdswell Small Housings Sites)

Q1 Are the Shepherdswell small housing sites justified, effective and consistent with national planning policy? How has the ability to create a safe vehicle and pedestrian access been taken into account in the allocation of site SHE006, whilst retaining the existing hedgerow?

- 2.1. The sites allocated in Shepherdswell represent an appropriate strategy for delivering growth within a sustainable Local Centre. A total of 70 dwellings have been allocated in Shepherdswell, of which 10 are allocated at SHE006 and 20 are covered by draft Policy SAP37 (Shepherdswell Small Housing Sites). The allocated sites have been subject to assessment via the Council's Housing and Employment Land Availability Assessment (HELAA¹), Sustainability Appraisal (SA²) and the Strategic Flood Risk Assessment³ including the Sequential Approach to Site Selection⁴. The conclusions within these evidence-based documents set out that the selection of the sites is acceptable. Thus, the sites are justified.
- 2.2. Draft Policy SAP37 requires the allocated developments to accord with policies within the Local Plan and address site specific issues. These requirements for site-specific issues are considered to be consistent with national planning policy by ensuring the proposed developments take account of environmental and social constraints effecting the sites.
- 2.3. With regards to the effectiveness of the allocations, CCE can provide details in terms of the deliverability of SHE006. The proposals put forward with the R19 Representations, and supporting vision document, were informed by technical consultant team to ensure the deliverability of the development. This included information from highways, drainage, landscape, ecology and heritage consultants. Additionally, the information demonstrates that additional units could be accommodated to the south of the site on land

¹ GEB09

² SD03a-c

³ CCEB01a - c

⁴ CCEB02

currently occupied by farm buildings. The addition of further houses in this location would assist in the deliverability of onsite affordable houses. CCE's work with English Rural on the adjacent site has demonstrated the clear need for affordable homes in the village. Further details of the proposals and supporting technical information are available within the vision document and technical notes that accompanied the R19 Representations.

- 2.4. CCE is the landowner of the site and is seeking to progress an outline application at the site. A development partner would deliver the development in line with the high Environmental, Social and Governance (ESG) standards in which CCE require within all the developments. It would be CCE's intention to bring the site forward within the first 5 years of the Plan Period and a pre-application has been prepared to submit to DDC imminently.
- 2.5. Examples of the high-quality development brought forward on CCE land can be seen across the country. A particularly relevant development lies adjacent to the SHE006 on the adjacent side of Coxhill. English Rural has begun construction of 10 affordable homes at the site named 'Carpenters Yard'. This site was previously CCE land and their requirements for high quality design, places and environment can be seen here in addition to demonstration of deliverability. Thus, the Inspector can be confident that CCE will ensure the delivery of a high quality development at SHE006.
- 2.6. Appendix 3 a-g demonstrates that access to the SHE006 was considered by Policy Officer and Kent County Council Highways (KCC). This was updated in October 2022 prior to the R19 Consultation. At the time Officer's and KCC considered that access appeared to be achievable from Coxhill but noted that hedgerow would be removed and that there was no footway serving the site. KCC always noted that the Coxhill may need to be widened. Further details on access were submitted to the Council during the R19 consultation which addresses these concerns.
- 2.7. Access to SHE006 has been carefully considered by Pell Frischmann, Engineering Consultants. As set out in the vision document, access is proposed from the existing agricultural access at the southeast of the site. This would minimise the impact to the existing hedgerow. To further protect the hedgerow, it is proposed that a footway is set within the site to the west of the hedgerow and connects to the existing footpath and Public Right of way further to the north of Coxhill. It is confirmed that the proposed vehicle access and footway access would be safe and suitable for all users in accordance with paragraph 110 of the National Planning Policy Framework.

- 2.8. Details of the explored access options is included at Appendix A of this statement.
- 2.9. With the detail above, the Council has Drafted Policy SAP37 to include requirements for a transport statement and retention of existing trees and hedgerows. CCE is certain that these requirements can be met.
- 2.10. In view of the foregoing, it is considered that safe and suitable access can be provided to serve the proposed development at SHE006. The Council has considered the access arrangements as part of their site selection and concluded that access is achievable. Further information has been provided by CCE to demonstrate to the Council that this access can be achieved whilst minimising the impact to the hedgerow and providing a footway to connect into the village. Therefore, the Inspector can be confident that the allocation of this site is justified by proportionate evidence and is deliverable for 10-25 dwellings.

3. Conclusion

- 3.1. As set out in the comments made above in respect to Matter 3 – Issue 5, CCE support the strategy in Shepherdswell including the allocation of SHE006 for residential development.
- 3.2. It is considered that the allocation of small sites within Shepherdswell is supported by proportionate evidence and the site-specific requirements are consistent with national planning policy. CCE can confirm their clear intentions to bring forward a high-quality development on the site within the first 5 years of the plan period. Consequently, the Inspector can be confident of the delivery of this allocation.
- 3.3. The access into SHE006 is supported by evidence from the Council, KCC and CCE. Suitable and safe access can be achieved into the site without the loss of hedgerow.
- 3.4. It is considered that the site can be used more efficiently by utilising the land to the southwest of the site which is currently occupied by redundant agricultural barns. This would make the most efficient use of land and provide up to 25 units.

Appendix A

Access Options – Technical Note

Project	Land at Botolph Farm, Shepherdswell, Kent
Document Title or Subject	Access Optioneering
Document Reference	106578-PEF-XX-XX-TN-TR-000804
Revision Reference	P01
Date	09 December 2022

1 Introduction

- 1.1.1 Pell Frischmann is commissioned by the Church Commissioners for England (CCfE) to provide transport planning and highways consultancy services in connection with the proposed development of Land at Botolph Farm (the Site), Shepherdswell, Kent.
- 1.1.2 Shepherdswell is located approximately 8km to the northwest of Dover and within the Dover District Council (DDC) local authority area. DDC are the Local Planning Authority (LPA) and Kent County Council (KCC) are the Local Highway Authority (LHA). The A2 is located approximately 1.4km southwest of the Site and is a part of the Strategic Road Network (SRN) for which National Highways (NH) is responsible as the Strategic Highway Authority.

Figure 1.1: Site surroundings of Site (left); Street level imagery of Coxhill (right)



- 1.1.3 The Site (**Figure 1.1, left in red alongside wider landholdings in blue**) is bounded by Coxhill, a rural lane (30mph speed limit) to the southeast of the Site (**Figure 1.1, right**). Vehicular access to the Site is achieved from Coxhill. Pell Frischmann have undertaken an exercise to identify the form and scale of a potential access, and how this would interact with the existing road, network. This Technical Note presents a summary of that process.

2 Design Rationale

- 2.1.1 The Site is located to the immediate south of the existing village of Shepherdswell and the location of the access is informed by the existing urban fabric of Shepherdswell, including recent new development at 'Land To The South West Of Village Hall' of 13 residential dwellings (DDC Planning Ref: 20/01508). The Site is also located adjacent to Boltoph Farm itself which has an existing agricultural vehicle access from Coxhill. Coxhill is a road with a rural character and is relatively narrow at approximately 4.8m width. It is bounded on both sides by mature hedgerows. A Public Right of Way (PROW) footpath crosses the Site and connects to Coxhill and the wider PROW network.

- 2.1.2 To ensure that roads are designed consistently and to properly “*reflect the need for public safety and the requirements of all modes of transport*”, KCC apply a hierarchy of road categories, defined through the Kent Design Guide: Movement & Connectivity: Designing for Movement (v1.0) and which specifies standardised road widths, junction radii and visibility requirements. Access into the Site is categorised as a ‘minor access way’ as it does not serve through traffic, will give direct access to properties, and serves a relatively small number of dwellings. Guidance has also been applied from Manual for Streets (Department for Transport, 2007).

3 Design Development

3.1 Option 1

- 3.1.1 Option 1 potential access junction design is shown in **Figure 3.1** below.

Figure 3.1: Option 1: Potential Access Junction to Site



- 3.1.2 KCC require a minimal junction separation of 50m. As an urban extension to Shepherdswell, it was initially proposed to provide access as close as feasible to the existing settlement so as to minimise pedestrian distances to local services and transport connections from local bus stops and the National Rail station. The southernmost junction in Shepherdswell is the new access to ‘Land To The South West Of Village Hall’ site (itself 50m from the next junction northwards).
- 3.1.3 Consequently, an initial proposal (Drawing Reference: 106578-PEF-XX-XX-DR-000784-P02) sought to provide a new priority junction at a position 50m to the south of the new ‘Land To The South West Of Village Hall’ site access. It was also proposed to include new 2.0m footways in line with KCC requirements and to ensure the new Site would connect to the existing pedestrian footway network in Shepherdswell. Visibility splays of 43m in

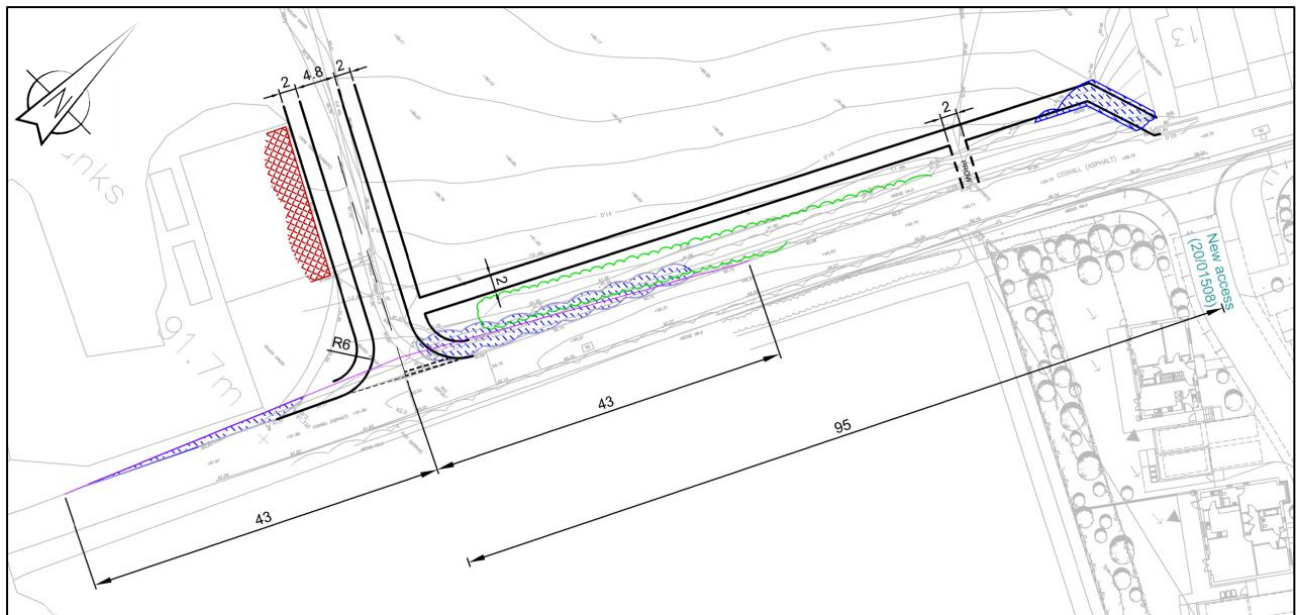
either direction (in line with Manual for Streets requirements for a 30mph road) would also be provided to ensure that the junction can operate safely.

3.1.4 However, to enable this junction to be installed and provide the necessary visibility splays to ensure the junction operates safely, the existing length of hedgerows to the west of Coxhill would need to be relocated.

3.2 Option 2

3.2.1 Option 2 potential access junction design is shown in **Figure 3.2** below.

Figure 3.2: Option 2: Potential Access Junction to Site



3.2.2 Therefore, a second proposed Site access has been considered. The second option incorporates and formalises the existing agricultural access to the south of the Site (Drawing Reference: 106578-PEF-XX-XX-DR-000785-P01; **Figure 3.2**). To minimise the impact on the hedge of the provision of the necessary visibility splays, it is proposed that the footway connection to Shepherdswell could be set back from the carriageway, to an alignment behind the existing hedgerow line. Connections would then be provided to retain the existing PROW link to Coxhill and additionally to provide a new connection through to the Shepherdswell footway network, and local services.

4 Conclusion

4.1.1 Two potential options for the design of the access road have been provided. Both options are achievable within the site ownership of the Client and the assumed Public Highway Boundary.

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