

Carter Jonas

MATTER 3 HEARING STATEMENT

Dover District Council Local Plan Examination

SUBMITTED ON BEHALF OF AXIS LAND PARTNERSHIPS LIMITED

October 2023

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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of our client Axis Land Partnerships Limited ('Axis') who have been appointed by the landowners to promote the site known as Land to the South of Aylesham ('the site') through the Local Plan process and ultimately bring the site forward for development. The site forms draft site allocation Policy SAP24.
- 1.2 Axis was appointed by the landowner, Trustees of the Lord Fitzwalter 1988 Settlement, in October 2022. As a land promotion and development company, Axis is experienced in delivering large strategic housing sites. Axis is owned by the Sir Robert McAlpine Group of companies which has over 150 years of experience of project delivery, including in-house design, project development, management and investment pre-construction support, building preservation and restoration and maintenance services.
- 1.3 Land to the South of Aylesham has been promoted for inclusion within the Dover District Council ('the Council') Local Plan at every consultation opportunity for the past decade. In 2019, Dover District Council (DDC) identified the site as a potential draft housing allocation and various meetings were held with members of the planning policy and highways teams at the Council. A high-level masterplan was also submitted via the Council's call for sites; demonstrating that the land could accommodate around 640 residential dwellings across a number of land parcels.
- 1.4 In December 2020, DDC's Cabinet approved the Draft Local Plan for Regulation 18 consultation. Representations were submitted in March 2021 in response to the then draft site allocation known as Strategic Policy 6 'South Aylesham' which were supported by masterplanning documents, movement plan and viability assessment (including commentary on the likely phasing of development) demonstrating the sites ability to deliver around 640 homes across nine parcels.
- 1.5 In November 2022, DDC published the Regulation 19 Submission Local Plan for consultation. As part of the submitted Dover Local Plan Regulation 18 representations, we had demonstrated that the site is able to accommodate circa 640 new dwellings. We therefore supported the renamed draft Policy SAP24's allocation to deliver an estimated 640 new homes over the Plan period to 2040.
- 1.6 Aylesham has proven to be a successful location in terms of housing delivery over the current Local Plan period and this site represents an exciting and logical opportunity to build on the successes achieved in Aylesham to date. South Aylesham is a large site which adjoins the existing settlement boundary, with the elements of the site which are proposed for development benefitting from few constraints in terms of topography, ecology and views.
- 1.7 As a result, Carter Jonas strongly support the inclusion of Policy SAP24 Land South of Aylesham and will attend the hearing sessions on Matter 3 Issue 4 on behalf of Axis.
- 1.8 This statement outline's Axis's comments in respect of Matter 3.

2 MATTER 3: HOUSING ALLOCATIONS

2.1 We respond to the specific issues arising in relation to Matter 3 below:

Issue 4: Aylesham Housing Sites

Question 1: What is the justification for allocation site SAP24, when considering the other reasonable alternatives for delivering growth around Aylesham? Is the chosen strategy an appropriate one?

- 2.2 Aylesham is defined as a rural service centre and is suitable for a scale of development that would reinforce its role as a provider of services to the rural area. The settlement benefits from a train station on the Dover to Canterbury railway line. Strategic Policy 3 (Housing Growth) establishes DDC's approach to the distribution of housing growth which is primarily based on settlement hierarchy, influenced by site availability, delivery factors and environmental constraints with Dover and Whitfield being the focus of new housing development. If following the settlement hierarchy, the secondary focus for development should be the district centre of Deal, followed by the rural service centres of Aylesham and Sandwich. However, given the limited supply of suitable and available housing sites in Deal and Sandwich the growth potential of these settlements is limited. As a result of this, the remaining housing growth not already identified in the settlements of Dover, Deal and Sandwich, will be delivered through the strategic expansion of Aylesham in accordance with the original vision conceived by Sir Patrick Abercrombie in 1928 for Aylesham to become a small garden town.
- 2.3 In line with this housing growth strategy, ED3 'Selection of Site Allocations Housing Site Addendum' (April 2023) sets out an overview of the history of the Aylesham site allocation selection process. As part of the Regulation 18 version of the Local Plan, DDC identified two potentially suitable sites for strategic site allocations. This included SAP24 (previously AYL003) and a site to the north of Aylesham (AYL004) for the delivery of 500 new homes. For both sites it was identified that further work was required as part of the assessment to identify mitigation for highway constraints.
- 2.4 Since 2019 the landowner and Axis, alongside the technical consultant team have completed a number of detailed assessments and technical reports to support the SAP24 draft allocation. This has included the production of a Vision Document comprising a concept masterplan establishing how the site can deliver 640 new homes, substantial open space, community facilities and a new access and the design principles that have informed this. Phasing and delivery are also considered in this document. Studies have also been undertaken with regards to highways including assessments to understand the impact of the allocation on the strategic and local highway and necessary mitigation to ensure that the scheme can come forward without any unacceptable impacts upon the road network. This has involved Axis, the landowner and technical team working closely with Kent County Council and DDC, with regular meetings to provide them with the required information to secure an appropriate draft allocation on this site.

- 2.5 Following the Regulation 18 consultation, AYL004 was considered unsuitable and was removed from the Regulation 19 Submission Local Plan, meaning that AYL003/SAP24 is the only remaining Aylesham strategic site allocation. ED3 concludes that SAP24 is considered to be a more suitable expansion to Aylesham, with the on-site constraints being able to be mitigated through the Local Plan policies and is preferred over AYL004 for a number of reasons.
- 2.6 One of the primary justifications for the inclusion of SAP24 instead of the alternative strategic allocation is the impact upon the road network. It was concluded that AYL004 would raise concerns in relation to the allocation's cumulative impact on the highways whereas SAP24 is likely to have a lesser impact upon the A257/High Street Junction location in Wingham. Analysis of the Regulation 18 transport models which included both sites show that in the AM and PM peak periods, SAP24 generates fewer trips travelling towards this junction. This is due to the location of SAP24 being a further distance from the A257/High Street junction and other alternative route options being available.
- 2.7 Due to the separation provided by Spinney Lane and the area of open space located at the Snowdown Colliery RFC, the SAP24 site allocation will have a lesser impact upon existing properties than the level of such impact arising from AYL004
- 2.8 In respect of landscape impact, whilst the assessment carried out for SAP24 identifies impacts upon the landscape as a result of the introduction of residential development on the site, it is considered that SAP24 is better screened and enclosed by existing landscape features including the Ancient Woodland, field boundary and highways verge landscaping than the alternative strategic allocation, AYL004. Mitigation in the form of a landscape buffer would also be contextually more appropriate to the landscape setting at SAP24 than to the north of Aylesham. Whilst SAP24 is a relatively contained and screened site, by contrast AYL004 is more visible in wider views.
- 2.9 The Sustainability Appraisal (SD03a) scores SAP24 (referenced therein as 'AYL003r2') higher in relation to SA2: access to amenities, SA4: transport, and SA8: climate change. SAP24 scores higher in this regard due to the proximity of the site to both Aylesham and Snowdown railway stations as well as the existing services and facilities in Aylesham village.
- 2.10 Given the above we consider that the inclusion of SAP24 is justified and this strategy is supported by the conclusions of the multiple assessments that have taken place to date.

Question 2: How does the site boundary relate to the possible development proposals in the emerging Canterbury Local Plan? When viewed in isolation, does it adequately reflect the form of the existing settlement?

- 2.11 The draft site allocation SAP24 and the site identified as draft site allocation 'R20' in Canterbury City Council's Regulation 18 Local Plan are both in the same ownership (Trustees of the Lord Fitzwalter 1988 Settlement). The administrative boundary between Dover and Canterbury effectively splits the wider land holding into two parts.

- 2.12 The Dover land has been promoted via the Local Plan process for the last decade as a logical, suitable and available site for residential led development which directly relates to the existing settlement of Aylesham. Via the Local Plan process, the masterplan for SAP24 has demonstrated that the site is capable of delivering a standalone new development to the south of Aylesham which simultaneously does not 'turn its back' on or close off the opportunity for further possible residential development to come forward on the Canterbury land in the future.
- 2.13 In terms of the Canterbury land (R20), the masterplan for this site would need to follow and reflect any future development at SAP24. The location of suitable pedestrian and vehicular connections between the two draft allocations have been confirmed by highways consultants to create synergy and connections between the potential future developments but neither site would be reliant upon the other for access.
- 2.14 When viewed in isolation, the Vision document submitted in support of the Regulation 19 representations for SAP24 clearly explains how the masterplan for the site has been developed to respect and reflect the existing settlement of Aylesham. The main axis of existing development in Aylesham from Market Place along Dorman Avenue South would continue through the proposed development creating both visual and transport connections between the existing settlement and any future development at SAP24. The main design principles seek to:
- respect the existing vale and restricting the proposed developable area to conclude at the bottom of the dry vale;
 - connect the woodland within the site to surrounding woodlands;
 - create gateways to the new development which respect the existing settlement; and
 - create a connected community.
- 2.15 Whilst all of these features would also benefit draft site allocation R20 within Canterbury if it comes forward, their primary aim is to create a strong foundation for a new community which works with and complements the existing settlement of Aylesham.

Question 3: What is the justification for the suggested changes to Policy? Why are they necessary for the soundness and will they be effective in achieving the expected outcomes?

- 2.16 Between the Regulation 19 consultation on the draft Local Plan and its submission, Canterbury City Council published the Regulation 18 Version of its Local Plan which included a draft site allocation (R20) adjacent to proposed site allocation SAP24. Dover District Council's suggested changes to the supporting text for SAP24 at paragraph 4.200 - 4.204 of SD06 (reference AM51) acknowledge draft allocation R20. There is a Statement of Common Ground between Dover District Council and Canterbury City Council (Ref: GEB03) This is supported.

- 2.17 The suggested change to Figure 4.6 (reference AM52) follows representations we submitted to the Regulation 19 consultation of the Local Plan. Figure 4.6 showed site allocation SAP25 on an inset map which was titled SAP24. As the allocations are separate, it was requested that this was amended to avoid confusion and in the spirit of soundness.
- 2.18 The detailed amendments to criteria c, k, m and o of draft Policy SAP24 (reference AM53) are understood to reflect responses received at the Regulation 19 consultation. In particular the changes to parts k, m and o reflect responses from statutory consultees. These amendments are supported.
- 2.19 The collective amendments to the supporting text for draft allocation SAP24 and the supporting text reflect the most up to date position in respect of the site allocation and their inclusion is supported for soundness purposes.

Question 4: What effect will the allocation have on the landscape character of the area, having particular regard to views to and from the AONB?

- 2.20 The landscape character of the site and its immediate context are well represented by its host landscape character area, as outlined within the Dover District Landscape Character Assessment, undertaken by LUC and published in 2020. The site is situated within the Open Arable Chalk Farmland with Parkland Landscape Character Type (LCT), and more specifically within the Shepherdsweil Aylesham Parklands E1 Landscape Character Area (LCA). The site contains stretches of well-established hedgerow which delineate field boundaries in the northern, eastern and southern areas of the site, these serve as key elements of the sites landscape fabric, along with Ackholt Wood - a prominent block of ancient woodland situated on the western edge of the site. Existing residential development and larger commercial buildings, situated upon topographically higher ground to the north, are visible from within the site and serve as urban detractors within the local landscape. In addition, the traffic along Spinney Lane and Aylesham Road serves to adversely impact the perceptual qualities of the site's landscape character.
- 2.21 The site lies around 600m outside of the Kent Downs AONB at its very closest point (the north western tip) and in excess of 1000m at its furthest point. Therefore the potential allocation/development of the site would not directly affect the AONB landscape and its special qualities. However, as outlined within national policy, the Kent Downs Management Plan 2021-2026 and more specifically the 'Setting Position Statement 2018', regard must be taken for the setting and views in and out of the AONB – in that they are primarily conserved and enhanced. Sustainable development principle SD8 and SD13 outline this clearly within the Kent Downs Management Plan.
- 2.22 The Kent Downs Way is a nationally promoted route which runs through the AONB, with views eastwards towards the well-wooded local landscape beyond the boundary of the Kent Downs AONB, in which the site is situated.
- 2.23 The masterplan and potential development of the site would be landscape-led, taking into account the potential effects upon the nearby AONB situated approximately 600m to the west of the site (at its closest). In respect

of visual amenity and views from within the AONB, the site is partially visible from a short section of the Kent Downs Way, between Adisham Road and where public footpath 0296/CB213/1 intersects it, west of Womenswold. The site can be partially seen situated below the well-wooded skyline, amongst a series of well-established mature hedgerow with hedgerow trees in the foreground, which serve to filter and partially screen areas of the site. The site forms a minor part of a much wider view out towards the AONB's eastward setting and is seen alongside existing larger scale commercial units situated within Aylesham Industrial Estate to the north, which are clearly visible upon the skyline, as well as large scale farm sheds within north Nonington.

2.24 A landscape-led approach to the draft allocation and future development of the site would ensure proposals do not break the skyline, in order to retain the character of the view and existing wooded backdrop to the site. In addition, mitigative measures would also ensure the site is brought forward without causing significant effects upon the setting on the Kent Downs AONB. An example of this would be to ensure the site's western edge is designed in a way that incorporates a rich planting corridor comprising native tree and shrub planting, which would serve to further filter and screen potential views of the proposals from within the AONB, but also enhance and better connect the existing green infrastructure assets within the immediate site context such as Ackholt and Aylesham Wood. Furthermore, existing key landscape features such as boundary hedgerow and hedgerow trees would be retained and reinforced with additional planting which would serve to enhance the landscape fabric of the site's character. Existing woodland should also be buffered against and enhanced to further ensure benefits to the wider green infrastructure network.

2.25 As outlined within the Kent Downs Setting Position Statement, many issues can be resolved through careful design and incorporation of appropriate mitigation and/or management measures. These primarily include:

- *“care over orientation, site layout, height, scale and massing of structures and buildings to minimise impact when viewed from the AONB;*
- *appropriate densities to allow for significant tree planting between buildings;*
- *consideration not just of the site but also the landscape, land uses and heritage assets around and beyond it;*
- *careful use of colours, materials and non-reflective surfaces;*
- *restraint and care over the installation and use of external lighting including street lighting, to prevent harm to the dark night skies of the AONB. Where essential, lighting should be well-directed and full cut off and of low level in form and lumen intensity;*
- *the grouping of new structures and buildings close to existing structures and buildings to avoid new expanses of development that are visible and out of context; and*
- *detailed mitigation and management measures, for example including native landscaping that is locally appropriate (where possible contributing to Biodiversity Action Plan targets) and noise reduction”*

2.26 The effect of the draft allocation on the landscape character of the area will be robustly tested through the LVIA process which is a requirement of part I of draft Policy SAP24. The site forms a minor element in a much wider

eastward facing view, from PRow within the AONB. Taking this into account, along with a series of mitigative measures, it is deemed that the allocation of the site would be brought forward without causing adverse effects upon either the setting of the Kent Downs AONB, particularly views to and from, or the local landscape character.

Question 5: What effect will the allocation have on the safe and efficient operation of the highway network?

- 2.27 To assess the current operational and safety characteristics of the highway network, a comprehensive set of baseline traffic surveys comprising of 6 x Manual Classified Counts (MCCs) and 2 x Automatic Traffic Counters (ATCs) were conducted by an independent company during a neutral time period (w/c 11th September 2023).
- 2.28 The primary purpose of gathering the refreshed data was to establish if the highway network had experienced a material reduction in the volume of traffic during the weekday AM and PM peak periods, resulting from a change in working practices, travel patterns/behaviours since the COVID-19 pandemic. Consultants, WSP (acting on behalf of DDC) state that other Local Authorities have experienced a circa 10% reduction since 2020.
- 2.29 The defined study area for the MCCs included the A257 Canterbury Road/B2046 High Street; B2046 Adisham Road/Dorman Avenue; Holt Street/Aylesham Road; B2046 Adisham Road/Spinney Lane; B2046 Adisham Road/A2 Slips; Old Dover Road/A260 junctions. The ATCs were installed within the vicinity of the site's proposed accesses off the southern and western sides of Spinney Lane and Aylesham Road, respectively.
- 2.30 In comparison with the previously gathered dataset (2019/20), the results of the MCC survey undertaken at the A257 Canterbury Road/B2046 High Street junction revealed that there had been a significant reduction in southbound vehicular traffic movements on the northern arm during the weekday AM peak hour period. Further, a significant reduction in northbound movements along the A257 Canterbury Road was also observed during the PM peak hour period.
- 2.31 The 2023 MCC survey data has been modelled using industry standard software, to establish the baseline performance of the aforementioned junctions. These assessments revealed that with the exception of two (i.e. A257 Canterbury Road/B2046 High Street; B2046 Adisham Road/Dorman Avenue), all junctions operate within capacity during the weekday AM and PM peak hour periods. Of note, the A257 Canterbury Road/B2046 High Street junction currently operates at or near to capacity. Therefore, even a negligible increase in traffic at this junction will result in exceedance of capacity due to the sensitive nature of the junction. Additional analysis in this regard is presented in Section 5 of the supporting Technical Note.
- 2.32 In addition, the results of the ATCs revealed that the observed speeds (85th percentile) were significantly below the national speed limit (i.e. 60-mph) currently present along Spinney Lane and Aylesham Road. This data supports a speed limit reduction from 60-mph to 50-mph along the section of highway adjacent to the site's northern and eastern frontages, thereby providing safer access for all motorised and non-motorised users.

- 2.33 The emerging residential-led development proposals for SAP24 incorporate the provision of two accesses located off the southern and western sides of Spinney Lane and Aylesham Road, respectively. The geometric design of the site's proposed primary and secondary accesses off Spinney Lane and Aylesham Road can achieve visibility splays in accordance with the observed speeds. Please refer to Section 4 of the supporting Technical Note. Consequently, car drivers would be afforded sufficient intervisibility with other motorised and non-motorised users, thereby enabling safe manoeuvres to be undertaken at the proposed give-way priority junctions.
- 2.34 As outlined in Section 4 of the supporting Technical Note, mitigation schemes have been proposed for the Holt Street/Aylesham Road and B2046 Adisham Road/Spinney Lane junctions, to minimise the impact of the development proposals with regards to capacity, the formation of queues and anticipated delays.
- 2.35 Based on applying vehicular trip rates contained within the Transport Assessment (TA), prepared by WSP (2021), in support of DDC's Regulation 19 Local Plan, the development proposals would have the potential to generate in the order of 293 two-way vehicle movements (68 arrivals and 225 departures).
- 2.36 When applying the same methodology (i.e. 2011 Origin and Destination data) used by WSP in preparing the Transport Assessment for DDC's Regulation 19 Local Plan, the additional vehicular traffic generated by SAP24 through the A257 Canterbury Road/B2046 High Street junction only accounts for 1.7% and 2.8% of the total movements during the weekday AM and PM peak hour periods, respectively. Please refer to Section 3 for additional information.
- 2.37 To assess the impact of the emerging residential-led development proposals on the future operation of the highway network during the weekday AM and PM peak hour periods, a '2040 Future Year + Committed Development' (with/without development) has been modelled. This assessment includes the proposed mitigation schemes for the Holt Street/Aylesham Road; B2046 Adisham Road/Spinney Lane junctions.
- 2.38 The results of the junction capacity modelling assessment for both the '2040 + Committed Development (With and Without SAP24 Development) scenarios reveal that for the two junctions (i.e. A257 Canterbury Road/B2046 High Street; B2046 Adisham Road/Dorman Avenue) currently operating at or near to capacity, there will be a slight worsening during the weekday AM and PM peak hour periods, as reflected in the increased vehicle queues and delays.
- 2.39 However, with regards to the A257 Canterbury Road/B2046 High Street junction, it is noteworthy that when comparing the '2040 + Committed Development (With and Without SAP24 Development) scenarios, the length of the vehicle queue on the southern arm of the junction (B2046 High Street) increases from 12 to 18 (i.e. net increase of 6) during the weekday AM peak hour period. This equates to one additional movement every 10-minutes. Such a negligible amount will not have a material impact on the operational performance of the A257 Canterbury Road/B2046 High Street junction.

- 2.40 Similarly in relation to the future operation of the B2046 Adisham Road/Dorman Avenue junction, the increase in vehicles queuing on the eastern arm (Dorman Avenue North) junction during the weekday AM peak hour period will be negligible.
- 2.41 To further minimise the impact of the emerging residential-led development proposals on the highway network, specifically in relation to the above-mentioned junctions, a package of mitigation measures including the potential provision of a new/diverted bus service, walk and cycle infrastructural improvements will be implemented to encourage future households and end-users to adopt long-term sustainable travel patterns/behaviours for a multitude of journey purposes.
- 2.42 The provision of a diverted or new bus service connecting the SAP24 site to key employment destination centres located in north Kent (i.e. Sandwich, Margate and Ramsgate) in conjunction with other travel planning measures will have the potential to reduce the number of vehicular movements heading in a northerly direction (via the B2046 Adisham Road/Dorman Avenue and A257 Canterbury Road/B2046 High Street junctions) by 75% during the weekday AM and PM peak hour periods.
- 2.43 Section 6 of the supporting Technical Note demonstrates that the potential intervention of a diverted or new bus service to address an existing gap in public transport provision, would reduce the manifestation of queues and delays on the eastern and southern arms of the A257 Canterbury Road/B2046 High Street and B2046 Adisham Road/Dorman Avenue junctions during the weekday AM and PM peak hour periods.
- 2.44 Of note, the modelling does not consider the potential transfer of trips from vehicle to bus from other existing households in Aylesham during the AM and PM peak hour periods. Consequently, the assessment presented in Section 6 of the Technical Note is likely to underestimate the impact of diverting or creating a new bus service.
- 2.45 In line with paragraph 111 of the National Planning Policy Framework, the results of this assessment demonstrate that the emerging residential-led development proposals would not not have a severe impact on the future operational performance of the site's proposed primary access off Spinney Lane as well as the other 6 junctions comprising the defined highway network. Consequently, it is concluded that the safety and efficiency of the highway network will be maintained through the implementation of mitigation measures.

Question 6: What is the justification for Policy SAP24(q)? What are the existing facilities that need upgrading and why?

- 2.46 We anticipate Dover District Council responding to this question. Inspectors should note that a Statement of Common Ground has been signed between Dover District Council and the promoter of SAP24. This provides a detailed breakdown of the wider strategic highways mitigation measures and improvements, on site open space and sports facilities, an on-site community facility, and the potential level of financial contributions towards off site infrastructure on a per unit basis for a policy compliant scheme.

Question 7: How have the effects of the development on biodiversity, including the ancient woodland (Ackholt Wood) been considered? What is the justification for the suggested changes to the Plan which seek to increase the buffer?

- 2.47 The effects of development on biodiversity in SAP24 have been considered in a number of ways through the Regulation 18 and Regulation 19 consultation process, and reflected in the SAP Allocation wording, and relevant Local Plan policies. These are detailed below.
- 2.48 A number of the Regulation 18 and 19 Reps (including from statutory and non-statutory consultees) make reference to the ancient woodland, Ackholt Wood, and wildlife within the site, and policy wording has been amended to reflect these.
- 2.49 In terms of Policy SAP24 - policy requirement part “k”, specifically considers ancient woodland, including a buffer zone, specifications as to the nature of the buffer zone, and a requirement to undertake a tree survey and ecological survey in advance of a planning application.
- 2.50 Policy requirement part “m” requires consideration of the potential effects of the development on biodiversity, through the requirement to ensure appropriate habitat and species surveys are carried out prior to determination, to inform layout and design and avoid ecological impacts. This would thus allow for compliance with the mitigation hierarchy, by informing sequential avoidance, mitigation and compensation measures, and additional enhancement measures, along with implementation management and monitoring of such measures.
- 2.51 The emerging draft Local Plan Policies, including SP-13 Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets, SP14-Enhancing Green Infrastructure and Biodiversity, and NE1-Biodiversity Net Gain will all facilitate consideration on effects of the development on biodiversity.
- 2.52 The Masterplanning Vision Document (submitted in support of our Regulation 19 Representations) demonstrates the ability to protect and celebrate the ancient woodland. This is illustrated through the design principles which seek to connect the local woodlands and through inclusion of a buffer within the concept masterplan. Furthermore, protection of biodiversity is viable and deliverable as demonstrated throughout the Vision Document, with references to biodiversity gain, and establishing habitats which support biodiversity. The inclusion of semi-natural habitats throughout the site, as shown within the concept masterplan, further show positive consideration of biodiversity.
- 2.53 The proposed buffer around Ackholt Wood was 15m up to and including the Regulation 19 Consultation on the draft Local Plan. The previously proposed buffer size aligned with the government’s standing advice which states there should be a buffer zone of at least 15 metres from the boundary of the woodland, or a minimum Root Protection Area for trees on the boundary, which ever is the larger.
- 2.54 The Reg 19 response from the statutory consultee Natural England (REP ID SDLP1456), does not directly comment on the ancient woodland buffer size, aside from that Natural England are pleased that the allocation considers impacts on the area of ancient woodland (Ackholt Wood) that falls within the site boundary and the

policy includes specific reference to the need to both protect and enhance this habitat (now included as policy requirement 'k').

- 2.55 Kent Downs AONB do not comment on the ancient woodland buffer in their Reg 19 responses (REP ID SDLP263).
- 2.56 The Woodland Trust submitted a general response to the Local Plan on biodiversity at REP ID SDLP652, relating to Strategic Policy 13 (Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets) noting that guidance for woodland buffers to be a minimum of 15 metres with wider buffers being sought where appropriate was welcomed. In response to SAP24 specifically, REP ID SDLP675, relating to SAP24 - Land to the South of Aylesham (AYL003), The Woodland Trust noted their preference for ancient woodlands to be excluded from site allocations. However, the minimum buffer of 15 metres in part k the draft policy was acknowledged and the Trust asked for this to be increased to at least 20 metres.
- 2.57 Therefore, the request for a 20 metre buffer is at the suggestion of the Woodland Trust. We understand that discussions have taken place between Dover District Council and the Woodland Trust. As the draft masterplan for the site does not envisage any built form within a 20 metre radius of the Ancient Woodland the increase in the buffer is achievable and can be included in the site allocation to help ensure biodiversity on site is prioritised.

POLICY SAP25

Question 1: Is the intention of this allocation to come forward separately, or as part of land south of Aylesham (SAP24)? Does the masterplan for site SAP24 need to account for this development too?

- 2.58 The intention is that draft site allocations SAP25 and SAP24 would come forward independently. These sites are in different land ownerships, and they are physically separated by Aylesham Road to the west of SAP25 and a band of mature hedgerow along SAP25's southern boundary. Whilst the masterplan for site SAP24 will clearly acknowledge and address the surrounding area, it is not realistic for this to include detail on neighbouring allocations.