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October 2023

**Examination of Dover Local Plan
Matters, Issues and Questions (MIQs)
Response to Matter 3 (Housing Allocations) – Issue 6 (Eythorne, Elvington and Wingham Housing Sites)
Policy SAP41 – “Footpath Field”, Staple Road, Wingham**

Background

This Matter Statement is submitted by Dandara South East Ltd in respect of land it controls (subject of an option agreement) at “Footpath Field”, Staple Road, Wingham. The site forms a proposed allocation under Policy SAP41 (Staple Road, Wingham) for development of an indicative capacity of 75 dwellings.

At the time of writing, full planning proposals are pending consideration for 71 dwellings including affordable/first homes provision (30%) and associated hard and soft landscaping (access, car parking, retained route of Public Right of Way, open space, and SuDS - ref. 23/00976)¹.

Dandara is in broad support of the emerging Local Plan including the wider strategic context of the Plan. This includes work on the Sustainability Appraisal and associated strategy in respect of the settlement hierarchy and the identification of growth at Wingham – identified as a Local Centre in the Local Plan and earmarked for an appropriate extent of growth.

This Matter Statement relates specifically to the Inspector’s questions (set out in MIQs) with regard to the site policy (SAP41). These are addressed further below.

Response to Matter 3 (Housing Allocations) – Issue 6 (Eythorne, Elvington and Wingham Housing Sites)**Policy SAP41 – Staple Road, Wingham*****Q1 – How has the scale of development proposed been established?***

The site has been the subject of lengthy engagement between Dandara and Dover District Council dating back to early 2021. Aligned to this, Dandara has undertaken a full suite of technical studies including those which now form the present planning application.

¹ [23/00976 | Full application for the erection of 71 dwellings including affordable housing, with associated access, infrastructure, drainage, public open space and landscaping and associated infrastructure | Footpath Field Staple Road Wingham \(dover.gov.uk\)](#)

The work includes a firm understanding on utilities contained on the site encompassing public trunk main, gravity sewer and rising mains. The presently pending planning layout has been designed to provide appropriate easements to utilities on site.

Equally so, the planning proposals have regard to other planning policy requirements including the need to achieve 10% Biodiversity Net Gain, open space provision, SuDs and road/parking infrastructure. An important aspect to the scheme is the retention of the route of the PROW which traverses the site, and this includes enhancement planting treatment along its edges.

For context, a constraints and opportunities plan (as derived from the Design and Access Statement) is enclosed at Appendix 1. This shows on site utilities as well as other policy opportunities including open space provision. The 3D visual of the proposals (Appendix 2) best portrays the resulting scheme for the site.

In this context, the scheme is firmly able to secure an “indicative capacity of 75 dwellings” for the site, and the Inspector will note the present full proposals for 71 dwellings. Accordingly, this element to the policy is considered to be sound.

Is it commensurate with the role and function of Wingham as a Local Centre?

The site forms only one of three proposed allocations in Wingham. Two small sites are proposed for allocation, including opposite Staple Road (est. 20 dwellings) and at White Lodge, Preston Hill (north of village confines – est. 8 dwellings).

Wingham comprises c. 750 properties with a population of c. 1,700. The allocation of the site is thus considered to represent a proportional extension of the village. The village provides ample services which will be supported by the development including primary school, doctor’s surgery, public houses and shops. This will include S106 contributions towards infrastructure provision, including *inter-alia*, primary and secondary education and adult social care.

The proposals adopt a landscape-led approach to development and are designed to provide soft landscape edges most notably to the northern and eastern boundaries. This includes open space provision (e.g. trim trials) and additional landscape planting. This will ensure that the development creates a sensitive transition from the village edge to the wider countryside.

The site has further been the subject of detailed discussions with the Local Highway Authority (KCC) in terms of the capacity of the road network in the village and its environs. In this regard KCC has confirmed that the two nearest junctions (Staple Road/Miller Close and Adisham Road/Staple Road) operate well within capacity in future years and the development is accepted to avoid having a detrimental impact on the operation of the junctions.

The main junction in the village (A257/B2046 High Street) is currently approaching capacity (on High Street arm). Whilst this is the case, KCC has indicated that the proposal represents a minimal impact on the junction. KCC is investigating potential mitigation measures towards this junction and developer obligations may be sought dependent on other future/strategic developments in the locality including at Aylesham.

Q2 – What is the justification for the suggested changes to Policy SAP41? Why are they necessary for soundness?

Dandara has reviewed the additional modifications (March 2023) by DDC and does not object to these. Yet as per our Regulation 19 representations we would seek minor modifications to other criterion of the policy – namely criterion e), and k). Our reasoning for this is addressed below.

Criterion e - Widening of Staple Road will be required along the site frontage with a footway provided along the frontage connecting to the existing network at Miller Close;

Survey work along Staple Road has established that it is not feasible to widen Staple Road or provide a footway along its northern boundary. This is impacted by the location of a Southern Water gravity sewer along the northern site boundary. Equally so, the land levels on the northern site boundary restrict road widening and in this context, it is considered important to retain the rural character of the road without extensive engineering works along its frontage. Furthermore, it is noted that the proposals retain the route of the PROW which secures an east - west route towards the village centre (in lieu of a route along the site frontage for east - west travel).

Accordingly, it is recommended that criterion e) is deleted from the policy.

It is accepted that DDC has not yet officially agreed the above position as part of the submitted planning application. As such, we would reluctantly welcome a minor modification (in lieu of criterion deletion) whereby ***“If required and feasible”*** is inserted at the beginning of the policy criteria. The criterion would therefore read:

“If required and feasible, widening of Staple Road will be required along the site frontage with a footway provided along the frontage connecting to the existing network at Miller Close” (Bold proposed insertion)

This will provide flexibility on the consideration of the criterion as part of the planning application for the site, enabling soundness in plan-making.

Criterion k - A Transport Assessment is required in accordance with Policy T12 to identify off-site highway improvements and sustainable transport measures that are necessary to serve the development. The Transport Assessment must evidence that there is no severe impact on the highway network and identify appropriate mitigation;

Dandara does not necessarily object to this criterion, yet it makes a presumption that off-site highway improvements and sustainable transport measures will be necessary to serve the development. Whilst it is investigating potential works at the A257/B2046 High Street junction, in discussions to-date, KCC has not identified any definitive off-site improvements. Accordingly, it is recommended that works are referred to as “potential” works as follows:

*“A Transport Assessment is required in accordance with Policy T12 to identify **potential** off-site highway improvements and sustainable transport measures that are necessary to serve the development. The Transport Assessment must evidence that there is no severe impact on the highway network and identify appropriate mitigation” (Bold proposed insertion)*

This proposed change will enable the policy criterion to be effective, thus meeting the NPPF tests of soundness.

Conclusion

Dandara is in broad support of the wider Local Plan, notably the allocation of land it controls at Staple Road, Wingham. The capacity of the site identified (est. 75 dwellings) is considered to be sound having regard to site constraints/utilities and other policy requirements (open space, SUDS, etc.).

As above Dandara would seek proposed minor amendments to criterion e) and k) of the emerging policy for the site. This will ensure that the policy criteria are effective, thus meeting the tests of soundness set out in the NPPF.

Appendix 1 – Constraints and Opportunities Plan

3 Design Approach

This section explains how the site analysis translates into constraints and opportunities for development and how existing site features can help to establish a sense of place.

It also describes the main design principles that inform the design of the masterplan.



3.1 Constraints and Opportunities

- 1 Retain alignment of PRow - providing connection to Wingham village and views of St Mary the Virgin Church - and integrate into the public realm
- 2 Retain existing pedestrian access points and utilise south-eastern access for emergency vehicles
- 3 Create new vehicular access points into the Site from Miller Close
- 4 Retain and enhance existing boundary vegetation and use as a basis of new green infrastructure
- 5 Respond to the adjacent property boundaries to the west by 'completing block' in a back-to-back arrangement
- 6 Respond to the adjacent property boundaries to east by off-setting development and creating new green space
- 7 Create positive frontages to Staple Road to the south, PRow within the Site and countryside to the north.
- 8 Maximise views of the surrounding countryside to the north including creation of new green space
- 9 Create open space along the northern boundary with positive frontage towards the countryside
- 10 Respond to urban fringe location by creating variation in density from east to west
- 11 Orientate buildings to maximise opportunities for passive solar gain
- 12 Design drainage systems to respond to the topography of Site and location of existing ditch
- 13 10m easement to water pipe is to remain as non-developable
- 14 6m easement to foul water pipe / and raising main is to remain as non-developable
- 15 3.048m easement to gas pipe is to remain as non-developable

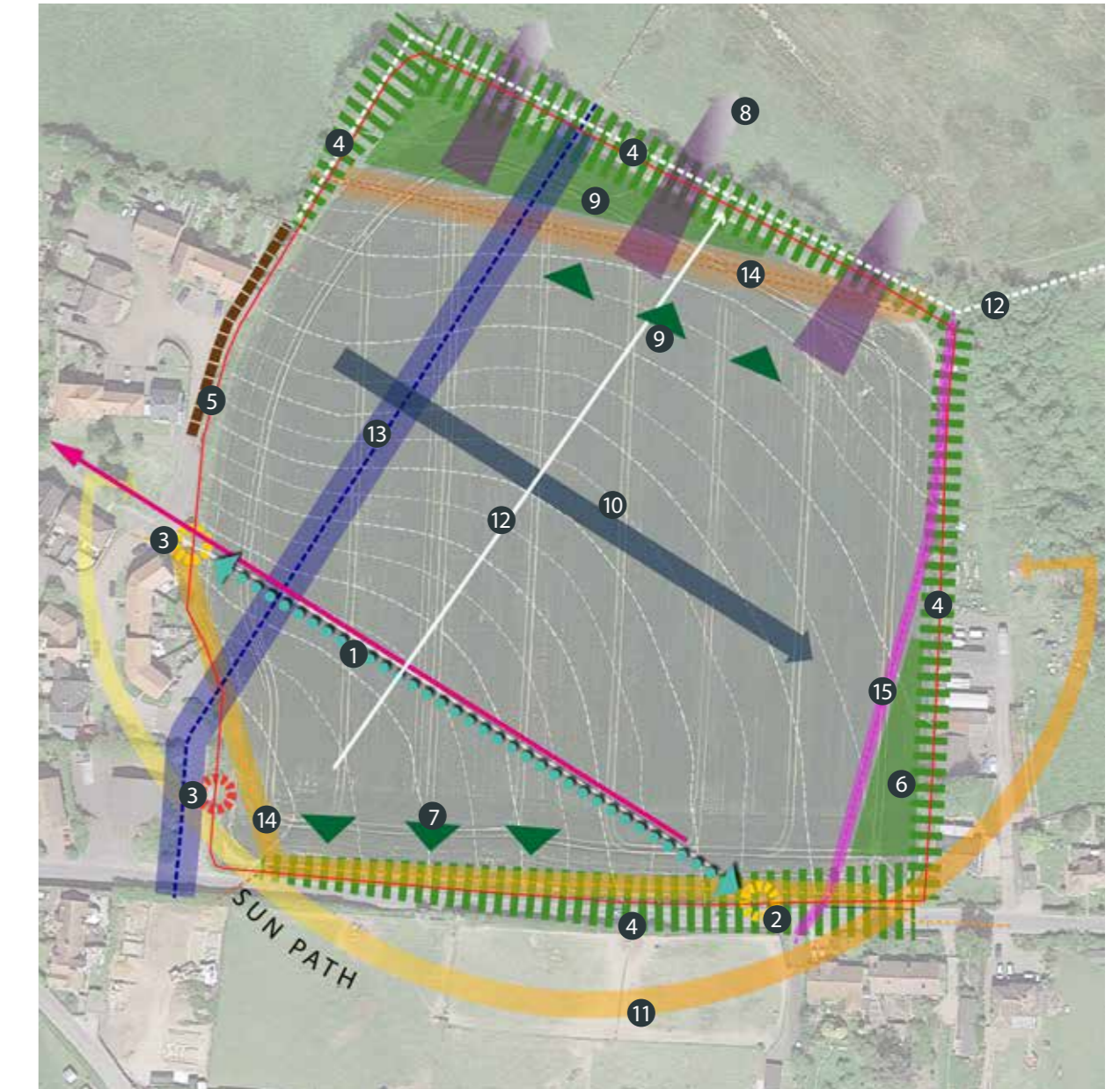


Fig 3.1 Constraints and Opportunities Plan

Appendix 2 – 3D Visual Perspective of Proposals

Our Proposals



3D illustration of the development

The layout has emerged in discussions with Officers at Dover District Council to create a development that integrates with the village and provides a neat transition to the wider rural surrounds. The density of homes across the Site has been carefully planned to ensure integration with Miller Close, and reducing density, with larger detached properties, towards the eastern and southern boundaries of the Site.