

**HEARING STATEMENT
RESPONSE TO
INSPECTOR'S
MATTERS, ISSUES AND
QUESTIONS
MATTER 3 (DOVER
HOUSING
ALLOCATIONS)**

Table of Contents

1.0	Introduction	1
1.1	Background	1
2.0	Responses to Matters, Issues and Questions	2
2.1	Matter 3, Issue 1: Policy SAP1 (Whitfield Urban Expansion)	2

1.0 Introduction

1.1 Background

This Hearing Statement has been prepared by Bidwells on behalf of Emmanuel College, Cambridge in respect of Matter 3 (Dover Housing Allocations) of the Dover Local Plan Examination in Public.

This Statement makes representations to the following issues:

- Issue 1: Policy SAP1 (Whitfield Urban Expansion)

Representations were made to the 'Regulation 19' Local Plan.

2.0 Responses to Matters, Issues and Questions

2.1 Matter 3, Issue 1: Policy SAP1 (Whitfield Urban Expansion)

Question 1: What is the latest position regarding planning permissions across the site? To assist the examination, it would be useful if the Council could provide a map showing progression across the various parcels to date and who is responsible for bringing forward the different components of the allocation

There is some ambiguity regarding the status of planning permissions at the Whitfield Urban Extension Site (SAP1). As identified above, it would be useful if the Council could produce a schedule and assessment outlining progress of planning applications, delivery entities/partners and the status of these applications. These should be linked to an assessment of deliverability of dwellings at the site against projections made in Appendix Di of the submission Plan.

The Council sets great store in the ability of strategic sites in the district to deliver almost 50% of dwellings across the Plan period. Given the complexity and size of these allocations, we remain unconvinced that such large sites will successfully fulfil the Council's projected delivery rates and will fulfil five year housing projections across the Plan period. This calls into question the Council's development strategy for the district which, if it cannot reasonably be fulfilled by strategic allocations, should consider an alternative strategy which offers flexibility and certainty over delivery. This should focus on smaller sites which are capable of delivering dwellings more quickly, as per paragraph 69 of the National Planning Policy Framework.

Question 5: If a revised masterplan is required, does this relate to the extension or the entire allocation? What impact will this have on the delivery of development across the site?

Policy SAP1 requires that a revised Supplementary Planning Document (SPD) will be required, incorporating the proposed extension to the site, to guide the future delivery of the Whitfield urban expansion. This will set out the quantum and distribution of land uses, access, sustainable design and layout principles, in addition to providing an updated phasing and delivery strategy for the whole site. This should be prepared by the landowner, working jointly with the Council, and key stakeholders. The masterplan shall be subject to a design review in accordance with Policy PM1 (Design). Policy PM1 states that where significant design implications are identified on major proposals these will be referred to a Design Review Panel.

The Inspector is right to raise this matter as it casts further doubt on the ability of the site to delivery according to the Council's projections. The scope and obligations of the SPD should be set out in planning policy which should clearly define who is responsible for producing the SPD. Notwithstanding however, it must be noted that producing a new or revised SPD will incur an additional burden of time and the Council must be mindful that to produce such a document would inevitably delay delivery of dwellings until formal endorsement or adoption of the SPD. We note the requirement of Policy PM1 to refer sites with potential issues to a Design Panel which would inevitably incur further delays.

We would request the Council to confirm its expectations for the SPD and a realistic timescale and due process for its preparation, community/stakeholder engagement, design review process, endorsement and adoption. Given the size and complexity of the site, it is important to assess this process in some detail as an inaccurate assessment of timescales would ultimately limit delivery of dwellings in the district and call into question the soundness of the Council's development strategy for the district.



BIDWELLS