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## **Hearing Statement in Response to the Inspectors Matters, Issues and Questions (MIQs)**

**Policy SAP45 – Land known as the former Archway Filling Station,  
New Dover Road, Capel-le-Ferne**

CLIENT: Guardian Parks and Development Ltd

OCTOBER 2023  
CJH/15938



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# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS REPRESENTATION

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- 1.1.1 This representation has been prepared by DHA Planning on behalf of our client, Guardian Parks and Development Ltd in response to the Inspector's Matters, Issues and Questions (MIQs), ahead of the Dover District Council (DDC) Local Plan Examination Hearings, which are due to take place in November and December 2023.
- 1.1.2 Our client has been promoting the land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne (draft submission allocation SAP45), hereafter referred to as 'the former Archway Filling Station' or 'the Site', for a residential allocation through preceding stages of the Local Plan.
- 1.1.3 In the Regulation 19 Submission Document (October 2022) the site was allocated for the provision of 10 dwellings under policy reference SAP45 (CAP011).
- 1.1.4 Our client submitted a representation in response to the Regulation 19 document in December 2022. The purpose of this submission was to support the allocation of the site, but for a greater quantum of development of approximately 18 dwellings. The site was considered to be a highly suitable edge-of-settlement location to allocate land for housing to help meet the need for new homes in the district and its effective use should be appropriately maximised in accordance with national policy objectives.
- 1.1.5 During the consultation, the Kent Downs AONB unit suggested that the allocation was not sound, due to the site being countryside and separated and unrelated to existing built form at Capel-le-Ferne.
- 1.1.6 This Hearing Document seeks to respond to the Inspector's Matters, Issues and Questions and address the concerns raised by the Kent Downs AONB unit. A Landscape and Visual Appraisal has been prepared in support of this document and is appended as **Appendix A**. It demonstrates that the site is well located in relation to the existing settlement pattern at Capel-le-Ferne and remains a logical location for residential development in landscape and visual terms.
- 1.1.7 Accordingly, we say that the site can further assist the Council in meeting the growing need for new homes in the district and help to ensure the Council can have greater confidence in meeting its market and affordable housing targets in full.

## 2 RESPONSE TO THE INSPECTORS' MIQS

### 2.1 MATTER 02 - HOUSING GROWTH AND RESIDENTIAL WINDFALL DEVELOPMENT

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#### Issue 3 – Housing Distribution – Policy SP3

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***Question 3 - Table 12 of the Council's Housing Topic Paper 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.***

- 2.1.1 DDC's settlement strategy focuses on the development and regeneration of Dover Town (including Whitfield) with the secondary focus for development in Deal, followed by the Rural Service Centres of Sandwich and Aylesham, reflecting their position within the settlement hierarchy.
- 2.1.2 The Rural Settlement Hierarchy Study (August 2022) identifies that beyond the principal district settlements (Dover, Deal, Sandwich, Aylesham), the lower-order settlements in the district have a low level of facilities, therefore offering limited opportunities for growth. This places further reliance on the higher tier settlements to deliver the housing growth required. There are also particular affordability issues, and a historic under delivery of affordable housing in rural settlements, which emphasise the need for growth at the second and third tier settlements.
- 2.1.3 It is our view that sustainable and accessible sites located adjacent to existing urban areas, represent the most reliable sources of growth for the Plan period. However, there remains the risk that delays in delivery at strategic locations, such as Whitfield, may occur and progress in terms of delivery at this location since its original allocation in the adopted Development Plan has been slow. The strategy must therefore comprise of an appropriate balance of small, medium, and strategic-scale sites at various locations across the district which are deliverable across the Plan period and capable of ensuring sufficient flexibility in delivering the district's needs and which reflects the inherent uncertainty that is associated with large-scale strategic growth.
- 2.1.4 The former Archway Filling Station is an accessible, edge of settlement location, which constitutes previously developed land and provides a clear opportunity to direct growth consistent with the growth strategy of the Plan as a whole. It is considered imperative that the use of such allocated sites are appropriately maximised in accordance with draft policy SP3 of the emerging Plan and national policy objectives, taking into account their particular site characteristics.
- 2.1.5 We remain of the view that reliable small scale housing allocations would appropriately re-balance the growth strategy such that DDC can have confidence in consistently meeting its market and affordable housing targets in full throughout the life of the new Dover District Plan in the event that identified sources of housing do not come forward or fail to deliver as anticipated.

## 2.2 03 – HOUSING ALLOCATIONS

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### Issue 9 – Housing Sites in Villages

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#### **Policy SAP44 and SAP45 – Capel-le-Ferne**

*Question 4 - Do any of the Small Housing Sites represent major development in the AONB, and if so, are they justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered? In answering this question, the Council should address any cumulative landscape impacts, especially from sites around Cauldham Lane?*

- 2.2.1 The sensitive landscape nature of the site is acknowledged given its location on the southern edge of the Kent Downs AONB and the quantum of dwellings proposed. However, as set out within the Housing Sites Landscape Assessment which forms part of the Council's Evidence Base, the established boundary planting to the north and western edges of the site have the potential to mitigate any impact and could be retained and enhanced as part of a future development.
- 2.2.2 As aforementioned, during the Regulation 19 consultation, the Kent Downs AONB unit suggested that the allocation was not sound due to the site being located within the countryside and separated and unrelated to existing built form at Capel-le-Ferne.
- 2.2.3 In light of this, a Landscape and Visual Appraisal has been undertaken, by request of the Council, to ascertain the existing landscape and visual context of the site and its relationship to Capel-le-Ferne and the AONB. This is appended in full as **Appendix A**.
- 2.2.4 It summarises that the key landscape feature of the site is its boundary vegetation, which consists of tall trees along the western and southern edges and a tall hedge along the southern edge. There are no other features of landscape value, reflecting its past land use as a former filling station.
- 2.2.5 The site is located at the edge of the Kent Downs AONB, and in a part of the AONB which is not undeveloped, being adjacent to residential land uses which extend 90m northwards from the B2011, to the same boundary extents. Furthermore there are several holiday homes and two tall communications masts, which result in a developed character to this part of the AONB. The site therefore is not considered to be representative of the special qualities of the AONB, due to its past land use and present derelict character.
- 2.2.6 The proposed development would result in a very small-scale addition of new residential land uses within the AONB and this change would occur at the edge of the AONB connected with the settlement of Capel-le-Ferne, and in a part of the AONB where there are residential, transport and infrastructure land uses.
- 2.2.7 Development of the site would conserve and enhance the existing vegetation around the perimeter (in accordance with draft policy requirements) and provides the opportunity to introduce high quality design to reflect the scale and extent of adjacent residential land uses. The proposal would therefore respond positively to AONB development policies and conserve the AONB's special qualities.

2.2.8 The following table sets out the LVA response to each of the Kent Down AONB Unit comments.

AONB UNIT COMMENT	LVA RESPONSE
<p><b><i>The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9.</i></b></p>	<p>Whilst the Site is within the AONB, it is located at its periphery, such that it is not contiguous with fields in the wider AONB to the north, east and south. As a periphery location, adjacent to the B2011, it is in a part of the AONB which the AONB landscape character assessment acknowledges has urban-fringe influences.</p> <p>The Site is not separated, nor unrelated, to existing built form at Capel-le-Fere. The Site is adjacent to residential land uses and 25m to the north-east of the settlement boundary. The Site is opposite residential land uses to the south of the B2011 and to the south of the communication masts.</p> <p>The Site’s boundary vegetation physically and visually separates the Site from the field to the west of the Site. The Site is therefore not perceived as countryside; it is perceived as derelict area of land which is well located in relation to existing residential land uses. Views of the Proposed Development would be very localised in relation to the AONB, and where visible the Proposed Development would be seen in the context of existing development.</p> <p>The allocation would therefore be complementary to the local settlement pattern in the AONB, reflecting the same spatial extent as adjacent residential land uses also within the AONB.</p> <p>The Proposed Development would not be in conflict with AONB Management Plan SD9 as there is no particular historic or locally distinctive character to this part of the AONB, nor the settlement pattern or local vernacular.</p> <p>In accordance with SD9, the Proposed Development can be designed to achieve high quality architecture which references the relevant AONB colour and landscape guidelines. At two storeys in height, the Proposed Development would also complement the local character and scale of existing development within the AONB and provides the opportunity to improve the scenic quality of derelict land.</p>
<p><b><i>The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George’s Close on the opposite side of New Dover Road, it is considered all the more important to retain.</i></b></p>	<p>The Site exhibits previous development via the hard-standing in the southern part of the Site. The open character only relates to ruderal vegetation growing across low earth mounds. There is no perception of the wider fields within the AONB due to the density of the perimeter vegetation. There is the perception of residential land uses to the east of the Site and the communication masts to the north of the Site.</p> <p>The Site is derelict and in a very low condition, such that the Site does not contribute positively to the rural character of the area – its is not of a rural character. The Site does not form part of the rural setting to Capel-le-Ferne as the Site as it does not consist of fields and is physically and visually separated from the fields by the boundary vegetation.</p>

	<p>The perception of the Site is mainly from along the B2011. When travelling east, the perception of the Site is that it is part of the residential land uses adjacent to the B2011, prior to the junction with Winehouse Lane. It is when one passes this junction and the speed limit increases, that one has the perception of leaving Capel-le-Ferne, with the setting provided by the fields on both sides of the B2011.</p> <p>When travelling west, it is similarly these fields on both sides of the B2011 which provide the sense of setting to Capel-le-Ferne. The perception at arriving at Capel-le-Ferne is when one arrives at the junction with Winehouse Lane and the speed limit decreases. In combination with the Site being adjacent to residential land uses, it is therefore perceived as being within Capel-le-Ferne and not part of its setting.</p>
<p><b><i>While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago.</i></b></p>	<p>Aerial mapping 3 indicates that the filling station was located in the southern part of the Site. The fact is that the current condition of the Site is low; with the hardstanding still present, such that the Site does not contribute positively to the townscape and roadside character.</p>
<p><b><i>The site has reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF.</i></b></p>	<p>There is ruderal vegetation covers low mounds and areas of former hardstanding. The boundary vegetation is also established. However, this does not equate to the suggestion that the Site has reverted to nature in a positive way to the Site's character or wider AONB. The Site is of lower sensitivity as it is not representative of the special qualities of the AONB and does not contribute positively to the street scene.</p>
<p><b><i>It is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.</i></b></p>	<p>Residential development of the Site would not be unsound; it would be entirely logical in landscape and visual terms due to the Site being well located to the existing settlement pattern and at the edge of AONB.</p> <p>The Proposed Development would conserve and enhance the existing vegetation around the perimeter of the Site and provides the opportunity to introduce high quality design and raise the design standards of the area. The Proposed Development would therefore respond positively to AONB development policies and conserve the AONB.</p> <p>The Proposed Development would not conflict with NPPF paragraph 176 as the scale and extent of the Proposed Development would be limited. The scale and extent of the Proposed Development would also reflect that of adjacent residential land uses, also within the AONB.</p> <p>Notwithstanding the Proposed Development is not major development, the predicted landscape and visual effects are moderated, and reduced to low tiers of effects as demonstrated by the assessment. There is also no impact to recreational opportunities, as the Site is not publicly accessible. Contrary to the AONB Unit's suggestions, the Site's allocation is considered to be justified and sound and represents a logical location for small scale residential development.</p>

TABLE 1: SUMMARY OF KENT DOWN AONB UNIT COMMENT WITH LVA RESPONSE

**Question 6 - What is the latest position regarding proposals for the sites in Capel-le Ferne?**

2.2.9 An indicative scheme has been prepared by our client for the former Archway Filling Station and is appended to this document as **Appendix B**. An excerpt is also shown overleaf as figure 1. The scheme would provide for 10 dwellings and address the requirements of allocation CAP011 under policy SAP45. A summary of the proposal scheme is as follows:

- Design takes influences from the nearby Pentland Homes development, creating an enclosed site space, with dwellings orientated to face inwards in a cul-de-sac arrangement with landscape buffers to the boundaries;
- Access is taken from New Dover Road at the south-west corner of the site;
- All existing trees and hedgerows along the boundary of the site have been retained and enhanced, with significant 10m landscape buffers proposed at the northern and western boundaries to mitigate any impacts on the Kent Downs AONB;
- A 3m buffer is proposed between the Site and the existing houses to the east to provide appropriate separation distances in terms of visual impacts and the safeguarding of residential amenity; and
- Whilst indicative at this stage only, in terms of scale and form, it is envisaged that the scheme would be 1-2 storeys in height, with 1 storey properties to the western edge of the site, allowing a gradual feathering out of built form towards the surrounding countryside. In terms of appearance, a materials and colour palette would be selected to reflect the architecture and character of the locality, combining traditional forms with contemporary details.



FIGURE 1: INDICATIVE SITE LAYOUT PLAN



- 2.2.10 The indicative scheme which reflects the indicative capacity as set out in policy SAP45 has been prepared alongside input from our clients' landscape and design consultants in order to provide a scheme which maintains the landscape character of the location and addresses the comments raised by the AONB unit.
- 2.2.11 It is considered that the indicative scheme would conserve and enhance the existing vegetation around the perimeter of the Site (in accordance with draft policy requirements) and provides the opportunity to introduce high quality design and raise the design standards of the area. The scale and extent of the proposal scheme would also reflect that of adjacent residential land uses, also within the AONB extending to the north of the B2011. The proposal scheme would therefore respond positively to AONB development policies and conserve the AONB's special qualities.
- 2.2.12 In terms of deliverability, whilst no pre-applications have taken place to date, the site remains available immediately and discussions have been ongoing with a number of interested parties who would look to deliver this site, including housebuilders. It is therefore anticipated the site could be delivered within the first five years of the plan period. Combined with the other allocations in Capel-le-Ferne and wider allocations in the district, this would ensure a steady delivery of housing in Dover district across the majority of the Plan period.
- 2.2.13 For the reasons set out in this document, the site is considered suitable for the residential development of approximately 10 dwellings. The site comprises previously developed land and lies in the settlement of Capel-le-Ferne, adjacent to existing residential development and would form a natural and logical development within the settlement.
- 2.2.14 There are no physical limitations or problems which cannot be overcome such as access, infrastructure, or flood risk. A Flood Risk Assessment is appended to this document as **Appendix C** which concludes that there are no flood risk issues identified that would restrict the quantity or type of development on the site.
- 2.2.15 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality, sustainably located residential development scheme consistent with the Council's proposed growth strategy comprising an appropriate mix of market and affordable housing and capable of contributing to a range of community facilities, public infrastructure and services locally.
- 2.2.16 The site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the Plan period. The site is therefore considered available and achievable for the purposes of the tests of deliverability.

## 2.3 MATTER 04 – MEETING HOUSING NEEDS

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### Issue 1 – Total Supply

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***Question 3 - Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer to allow for changing circumstances on development sites?***

- 2.3.1 DDC's total supply of housing within the Plan is understood to include a contingency buffer of 994 dwellings. The sources of such dwellings are not specified but it remains our client's view that a substantive oversupply of housing is required in order to balance the Council's growth strategy and ensure a pragmatic degree of flexibility in the event that strategic-scale growth does not deliver as anticipated.
- 2.3.2 Should such strategic-sites not come forward as intended, there would potentially be an undersupply of some 2,200 dwellings. Whilst policy SP4 may go some way in addressing such a shortfall by way of windfall development within or close to settlement confines, it would be grossly insufficient in fully addressing the scale of the potential deficit.
- 2.3.3 It is our client's view that a substantive oversupply of additional sites is required in order to provide a pool of sustainable, reliable sites that can come forward as part of a cohesive plan-led development strategy and deliver market and affordable housing growth should the housing trajectory not unfold as anticipated.

### Issue 2 – Five Year Housing Land Supply

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***Question 7 - What flexibility does the Plan provide if some of the larger sites, such as the Whitfield Urban Extension, do not come forward in the timescales envisaged?***

- 2.3.4 It is understood that DDC's 5 Year Housing Land Supply position includes a 10% buffer in accordance with paragraph 74b of the NPPF. It does not however include any further contingency in the event that larger sites do not deliver as intended.
- 2.3.5 It is our client's view that the Plan fails to demonstrate a sound strategy for growth due the imbalanced weighting of committed dwellings on strategic sites and the relative undersupply of committed housing from other sustainable sites. It is our client's view that an oversupply of additional sites should be identified and included as an oversupply within DDC's growth strategy in order to ensure the soundness of the Plan.

## 3 CONCLUSION

### 3.1 SUMMARY

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- 3.1.1 This representation has been prepared by DHA Planning on behalf of Guardian Parks Ltd in response to the Inspectors Matters, Issues and Questions ahead of the Dover Local Plan Examination.
- 3.1.2 On account of the above, and the details included within our previous representations, we are of the view that the Council's allocation of the former Archway Filling Station is justified and will provide much needed housing for the district, which is capable of delivery early in the plan period.
- 3.1.3 Our clients are fully supportive of the indicative capacity set out in Policy SAP45. Furthermore the work undertaken to date on an indicative proposal scheme has demonstrated that the site can fulfil the requirements of the allocation policy and protect and enhance the character of the Kent Downs AONB.
- 3.1.4 In addition to being a highly sustainable and logical edge-of-settlement allocation, the site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present.

APPENDIX

A



# Former Archway Service Station Capel-le-Ferne, Dover

## Landscape and Visual Appraisal



Prepared for Guardian Parks & Developments Ltd

October 2023

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## **I.0 INTRODUCTION**

- 1.1 RHLA Ltd were appointed by Guardian Parks & Development Ltd to undertake a Landscape and Visual Appraisal (LVA) of the former Archway Filling Station, at Capel-le-Ferne, Kent ('the Site').
- 1.2 With reference to **Figure I**, the Site is allocated for residential land uses in the Dover Local Plan to 2040 (submitted to the Secretary of State on 31<sup>st</sup> March 2023) as ref: CAP011. The supporting policy sets out the Site is within the Kent Downs Area of Outstanding Natural Beauty (AONB) and that any scheme should mitigate the impacts on the AONB.
- 1.3 **Figure I** also demonstrates that the Site is adjacent to existing residential land uses also within the AONB and to the south of the B2011. The Site is also in close proximity to Capel-le-Ferne's settlement boundary which extends to the south-west of the Site.
- 1.4 During the consultation for the Local Plan to 2040, the Kent Downs AONB Unit suggested that the allocation was not sound, due to the Site being countryside and separated and unrelated to existing built form at Capel-le-Ferne.
- 1.5 The LVA has therefore been undertaken to ascertain the existing landscape and visual context of the Site and its relationship to Capel-le-Ferne and the AONB. The LVA also undertakes a high level assessment of the potential landscape and visual effects of new residential development ('the Proposed Development') at the Site and responds to the Kent Downs AONB Unit consultation suggestions.
- 1.6 The LVA has been undertaken by Chartered Landscape Architects with extensive experience in residential led assessments across Dover and in Kent.

## 2.0 LVA METHODOLOGY SUMMARY

2.1 The LVA methodology follows the best practice principles for assessing landscape and visual effects as recommended by the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA 3). The LVA methodology is set out in full in **Appendix I** and is summarised below.

2.2 Landscape and visual matters are assessed separately, such that:

- Landscape (also covers the townscape) – assesses the effects of the Proposed Development on the landscape as a resource (i.e. change to the physical features of the landscape and/or the aesthetic, perceptual and experiential characteristics that make different landscapes distinctive); and
- Visual – assess effects of the Proposed Development on people’s views from the change to existing features or the introduction of new elements within the composition of the view.

### Landscape Sensitivity and Magnitude of Impact

2.3 The landscape effects are assessed by determining the sensitivity of the landscape receptors (i.e. the Site and published landscape character areas). In accordance with GLVIA 3, the sensitivity of landscape receptors is determined via an assessment of their landscape value and landscape susceptibility. With reference to **Appendix I**, the landscape sensitivity is defined as either very high, high, medium, low or very low.

2.4 The potential landscape magnitude of impact (change) is informed by judgements about the size and extent of the Proposed Development and the duration and reversibility of the Proposed Development. With reference to **Appendix I**, the magnitude of impact is assessed as either high, medium, low, very low or none.

2.5 The relationship between the landscape sensitivity and the landscape magnitude of impact determines a landscape effect. Landscape effects may be beneficial or adverse and are assessed as either major, moderate, minor, negligible or neutral as set out below.

### Visual Sensitivity and Magnitude of Impact

2.6 The visual effects are determined by identifying a representative range of people (‘visual receptors’) with the potential for views of the Proposed Development.

2.7 The sensitivity of the visual receptors is assessed by determining their value and susceptibility. With reference to **Appendix I**, visual sensitivity is defined as either very high, high, medium, low or very low.



- 2.8 The visual magnitude of impact (change) is described with reference to the scale of change in the composition of the view and the distance between the visual receptor and the Proposed Development. The magnitude of visual impact is assessed as either high, medium, low, very low or none.
- 2.9 Like the landscape assessment, the relationship between the visual sensitivity and visual magnitude of impact establishes a visual effect. Visual effects may be beneficial or adverse and are determined as either major, moderate, minor, minor negligible or neutral, as set out below.

### Landscape and Visual Significance of Effects

- 2.10 Table 2-1 is used to guide the assessment of landscape and visual effects, based upon the relationship between the sensitivity of receptors and the magnitude of impact. Where the assessment differs from this guide, a reasoned explanation is provided in the assessment narrative.

Table 2-1: Guide to the Significance of Landscape and Visual Effects

Sensitivity of Receptor	Magnitude of Impact				
	High	Medium	Low	Very Low	None
<b>Very High</b>	Major	Major	Major or Moderate	Moderate or Minor	Neutral
<b>High</b>	Major or Moderate	Major or Moderate	Moderate or Minor	Minor or Negligible	Neutral
<b>Medium</b>	Major or Moderate	Moderate or Minor	Minor or Negligible	Negligible	Neutral
<b>Low</b>	Moderate or Minor	Minor	Minor or Negligible	Negligible or Neutral	Neutral
<b>Very Low</b>	Minor or Negligible	Negligible	Negligible or Neutral	Neutral	Neutral

- 2.11 Major or moderate effects are considered 'important effects', with minor, negligible and neutral effects considered 'less important'.
- 2.12 Where the guide allows for a choice in the effect (i.e. moderate or minor), the decision is based on professional judgement with a reasoned explanation in the assessment narrative for the single predicted effect (i.e. minor).

### Lighting Assessment

- 2.13 The LVA reviews published information in respect of the character of the night sky and has included for night-time fieldwork. A subjective assessment is undertaken in respect of the new lighting and potential effects to the character of the night sky. The lighting assessment is qualitative (not measured) and assumes that all lighting within the Proposed Development would be designed in accordance with the relevant industry standards to minimise light spillage and glare.

### **Assessment Scope, Assumptions and Limitations**

- 2.14 The LVA fieldwork has been undertaken from publicly accessible locations during October 2023, during clear visibility and when the deciduous vegetation was not in leaf.
- 2.15 The Proposed Development is assessed for the operational phase, i.e. when built out and complete, in winter and summer conditions. This is considered appropriate as the construction phase is temporary and the pertinent matter is the potential introduction of new dwellings in the landscape and the associated change in land use at the Site.
- 2.16 The assessment is based upon a sketch layout plan, as set out in Chapter 9, with new dwellings up to two storeys in height. The assessment also assumes the retention and enhancement of existing boundary vegetation as practicable and a high architectural quality with reference to relevant guidelines, so to adhere with planning policies for the Site.

### 3.0 THE SITE

3.1 With reference to **Figure I**, the Site is a broadly rectangular area of land, located in the eastern part of Capel-le-Ferne and covers c.0.7 hectares (ha). The Site is bound by:

- Fields and two communication masts to the north;
- Residential land uses to the east;
- The B2011 and residential land uses to the south; and
- Fields to the west.

3.2 With reference to following extract of on-line mapping, the Site was formerly a filling station, which was located in the southern part of the Site, with associated access onto the B2011. As per the current baseline, the Site was bordered by residential land uses to the east and the communications masts to the north.



Image 3-1: Extract of on-line mapping (courtesy of Google maps) showing the former filling station in the southern part of the Site

3.3 With reference to the following photograph, the current baseline is that the Site is bound by tall trees, mainly along its western and northern edges, up to 12m in height. There is also a tall hedge along its southern edge, up to 4m in height. Within the Site, there are several low mounds and ruderal vegetation, mainly consisting of brambles.



Image 3-2: View from the south-west part of the Site, looking north-east, across the former hardstanding of the filling station, towards residential land uses adjacent to the Site.

- 3.4 The landform across the Site is generally flat, with the Site situated at around 140m Above Ordnance Datum (AOD). As set out above, the main landscape feature of the Site is the boundary vegetation.
- 3.5 With reference to on-line mapping<sup>1</sup>, the Site is not crossed by any formal public rights of way (PRoW) and is not publicly accessible.
- 3.6 With reference to **Figure I**, the south-west part of the Site is 25m to the north-east of the settlement boundary, which extends along the B2011 and adjacent to residential land uses. There is also inter-visibility between the Site and the communications masts to the north. The Site is therefore well located in relation to the existing settlement pattern.
- 3.7 The Site is not within, nor adjacent to a Conservation Area, nor does it contain any listed buildings or scheduled monuments. The Site does not contain any ancient woodland. The Site is not within the Heritage Coast, which is beyond the Old Dover Road, 230m to the south of the Site..
- 3.8 The boundary vegetation screens the internal part of the Site from the majority of the surrounding area, except for when adjacent to the entrance into the Site, along the B2011. At this location, a small part of the Site is visible, along with its evidently poor condition, such that the perception is of derelict land.
- 3.9 With reference to **Figure I**, the Site is located at the southern edge of the AONB, with the B2011 forming the boundary of the designation. In relation to the Site, the AONB extends across:
- Fields, the two communication masts, Satmar holiday park and the A20 to the north of the Site;
  - Residential land uses adjacent to the B2011, a holiday home park and White Cliffs Parks North to the east of the Site;

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<sup>1</sup> Kent County Council, on-line PRoW mapping, <https://www.kent.gov.uk/environment-waste-and-planning/public-rights-of-way/rights-of-way-map>

- The coastline to the south of the Old Dover Road, 230m to the south of the Site, with the intervening distance consisting of residential and holiday home land uses; and
- Fields to the west of the Site, extending to PRoW (public bridleway) 0052/ER252/6, 190m to the west of the Site.

3.10 The Site is therefore located in a part of the AONB which is not undeveloped, with the Site adjacent to residential land uses which extend 90m northwards from the B2011, to the same extent as the Site. In addition, the Site is also in a part of the AONB where there are several holiday homes and two tall communications masts, which result in a developed character to this part of the AONB.

3.11 The special qualities of the AONB area set out in the AONB Management Plan<sup>2</sup>. The following table sets out the Site's relevance to them.

Table 3-1: The AONB Special Qualities and the Site

AONB Special Qualities	The Site
Dramatic landform and views, including the south-facing scarp slope and long distance panoramic views.	As an area of flat and in part previously developed land, the Site is not representative of the dramatic landform, nor is the Site in proximity to the south-facing scarp. As demonstrated by the following visual appraisal the Site is not visible in long distance views, nor panoramic views, due to its location adjacent to existing residential land uses.
Biodiversity rich habitats, particularly chalk downland.	The Site is not representative of these habitats.
Farmed landscape, reflecting the long established land use.	The Site is not representative of this land use.
Woodland and trees, reflecting the high percentage of ancient woodland across the AONB.	The Site does not contain woodland. The Site boundaries contain trees, but these are not part of any ancient woodland and a common feature in the AONB.
A rich legacy of historic and cultural heritage, covering past settlements and artistic association.	The Site is not representative of this quality, being a former filling station.
The Heritage Coast.	The Site is not part of the Heritage Coast.
Geology and natural resources.	The Site is not representative of this quality, being in part an area of previously developed land.
Tranquillity and remoteness and dark skies	<b>Due to the Site's location adjacent to the B2011</b> , residential land uses and the communication masts, there is no sense of remoteness, nor tranquillity. With reference to on-line mapping, the Site is not within an area of dark skies.

3.12 From the above, the Site is considered not to be representative of the stated special qualities of the AONB. Whilst there are trees on the Site, as set out in the following chapters, the design intent is for this boundary vegetation to be retained and enhanced, thereby any 'value' from the existing vegetation would be retained.

<sup>2</sup> Kent Downs AONB, AONB Management Plan, 2021-2026, <https://kentdowns.org.uk/landscape-management/management-plan/>

- 3.13 Whilst the AONB is generically afforded a higher landscape sensitivity (due to a higher value and susceptibility), GLVIA 3 sets out that at a local scale, the landscape value of a specific area may be different from that of the formal designation (GLVIA 3 paragraph 5.24).
- 3.14 The following tables sets out the potential indicators of landscape value within designated landscapes from GLVIA 3 Box 5.1 and the Site's relationship to them.

Table 3-2: GLVIA 3 Box 5.1 Landscape Value and the Site

GLVIA 3 Box 5.1	The Site
Landscape condition.	Low, due to the derelict character of the Site.
Scenic quality.	Low overall, due to the derelict character, although there is a scenic quality from the boundary vegetation.
Rarity.	None, there are no rare features in the Site.
Representativeness.	As set out in the following chapters, the Site is not representative of the stated characteristics of the landscape character assessments covering the Site and surrounding rural landscape.
Conservation interest.	None.
Recreational value.	None, the Site is not publicly accessible.
Perceptual aspects.	Very low, due to its derelict character. The Site is perceived in the context of existing residential land uses adjacent to the B, where the settlement pattern extends in a more intermittent form due to the varying scale of properties and holiday homes.
Associations.	None.

- 3.15 From the above table, notwithstanding the generic higher value assigned to the AONB, the Site exhibits a very low landscape value and is not representative of the higher value of the AONB.
- 3.16 In terms of the Site's susceptibility, i.e. its ability to accommodate change, the Site is in part a former filling station and area of flat landform. Therefore, the Site is considered to have a low susceptibility to the Proposed Development (i.e. a high ability to accommodate change).
- 3.17 The combination of the lower attributes of landscape value and the low susceptibility results in the Site have a medium sensitivity to the Proposed Development, and one which is lower than the generically very high sensitivity assigned to the AONB.

## 4.0 LANDSCAPE BASELINE

- 4.1 With reference to GLVIA 3, the purpose of the LVA study area is to identify the geographic area in which effects may occur due to the Proposed Development.
- 4.2 The study area has been determined through desk-based studies, reviews of aerial mapping, published landscape character assessments and fieldwork. With reference to **Figure I**, the study area covers a 2 kilometre (km) radius from the Site, extending to:
- Hockley Sole and West Hougham to the north of the Site;
  - The A20 to the east of the Site;
  - East Wear Bay to the south of the Site; and
  - Capel-le-Ferne to the west of the Site.
- 4.3 The above study area is assessed as being proportionate to the Proposed Development. Any perception of the Proposed Development from beyond the study area would not result in landscape and visual effects due to the combination of distance, intervening features and the existing perception of Capel-le-Ferne.
- 4.4 The following section summarises the key landscape features across the study area in relation to the Site.

### Landform and Hydrology

- 4.5 With reference to **Figure I**, to the north of the Site, the landform remains at a similar elevation as the Site, at around 140m AOD and for approximately 225m to the alignment of PRow (footpath) 0052/ER241/1. To the north of this PRow, the landform then rises gradually towards Winehouse Lane, 260m to the north of the Site, before rising more notably up to 153m AOD, between the lane and the A20 (which is in cutting), 800m to the north of the Site. The landform then falls to the north of the A20, forming a complex pattern of undulating landform across the northern part of the study area.
- 4.6 To the east of the Site, the landform remains at a similar elevation as the Site across residential land uses adjacent to the B2011. The landform then rises to the west of Winehouse Lane, to form a tract of gently undulating land around 146m AOD adjacent to the A20, 1km to the east of the Site. To the east of the A20, a narrow plateau at around 145m AOD extends towards Great Hougham Court Farm, whilst the landform falls to the north and south of this plateau across the eastern part of the study area.
- 4.7 To the south of the Site the landform remains at a similar elevation as the Site across residential and holiday home land uses, extending to Old Dover Road, 230m to the south of the Site. The landform then falls very steeply to the south of the road, across The Warren, to around 40m AOD, before transitioning into East Wear Bay.

- 4.8 To the west of the Site, the landform also remains at a similar elevation as the Site across the field and residential land uses adjacent to Helena Road. The landform then rises consistently along the alignment of the B2011, to around 170m AOD at the western edge of the study area.
- 4.9 The Site is therefore located in a low lying position in the landscape in relation to more elevated land in the northern part of the study area, adjacent to the A20. This elevated land forms a ridgeline in relation to the wider study area, which as demonstrated by the following visual appraisal negates any potential inter-visibility with the Site to the north of the A20. The Site is also at the same topographic position within the landscape as surrounding residential and transport land uses, such that it is physically well related to the surrounding townscape.

### **Settlement Pattern and Land Use**

- 4.10 With reference to **Figure 1**, Capel-le-Ferne's settlement boundary is concentrated around the junction of the B2011 and Capel Street, 800m to the west of the Site, from which residential land uses extend in a broadly triangular form to Helena Road, 1900m to the west of the Site and George Close, 25m to the south-west of the Site. The settlement pattern also extends northwards, in a linear ribbon pattern along Capel Street, towards the A20.
- 4.11 In relation to the Site, the perception of Capel-le-Ferne's settlement pattern (i.e. the 'reality on the ground') is that it extends from the western edge of Capel-le-Ferne to the junction of the B2011 and the Old Dover Road, 570m to the east of the Site, due to the combination of residential land uses, transport land uses and holiday homes. The 190m of fields between the Site and residential land uses adjacent to Helena Road do not form any type of gap or perceived separation in the settlement pattern, due to the residential land uses adjacent to the southern side of the B2011.
- 4.12 Residential land uses adjacent to the Site consist of two storey semi-detached and detached bungalows, adjacent to the B2011. Facades are a mixture of red brick and white render. Boundary treatments are low brick walls or timber fencing, with off-street parking. To the south of the Site, Capel Court Park consists of dense arrangement of detached single storey holiday homes, which are predominantly rectangular in form and set within amenity grassland.
- 4.13 Little Satmar Holiday Park is located 320m to the north of the Site and consists of a dense arrangement of single storey dwellings.
- 4.14 There are contemporary residential properties 25m to the south-west of the Site at George Close. These are characterised by two to three storey properties, with brick and weatherboard facades. Many of the properties have steeply pitched rooflines between the second and third stories.
- 4.15 Residential land uses 190m to the west of the Site, adjacent to Helena Road, are mainly brick bungalows, interspersed with two storey detached properties. The buildings are generally set within



well vegetated grounds, with off-street parking and boundary treatments consisting of hedges or low brick walls.

- 4.16 The B2011 is a single lane road (in each direction) and is bordered by tall lighting columns and telegraph poles. There are several pedestrian crossings and bus stops along the road, with associated signage. The transition in the speed limit along the B2011 is 90m to the east of the Site, at the junction with Winehouse Lane.
- 4.17 Other land uses within Capel-le-Ferne include visitor attractions at the Battle of Britain, 1km to the south-west of the Site and The Warren and East Cliff and Warren Country Park, 250m to the south of the Site. There are two tall communications masts (90m and 120m to the north of the Site). Each mast is set within a small fenced compound and supported by several long tension wires. There is a small single storey brick building in a fenced compound located between the two masts.
- 4.18 West Hougham, in the north-east part of the study area, is a small village, consisting of a mixture of two storey semi-detached, detached and bungalows concentrated adjacent to the lanes.
- 4.19 Beyond these residential and transport land uses, the main land use is agricultural, consisting of arable fields of varying sizes and forms; although generally, the scale of fields is smaller between Capel-le-Ferne and the A20, with larger scale fields to the north of the A20.
- 4.20 The Site is therefore well located in relation to the existing settlement pattern, being adjacent to residential land uses along the B2011 and in a part of the townscape where buildings are up to three storeys in height. The Site is also perceived as within Capel-le-Ferne due to being located along the B2011, adjacent to residential land uses and where there are lower speed limits denoting a change from the approach to Capel-le-Ferne, pedestrian crossings and bus stops.

### **Vegetation Patterns**

- 4.21 There is a contrast across the study area between extensive areas of arable land which are generally open in character, well vegetated roads and lanes, and residential areas generally set within well vegetated grounds.
- 4.22 In proximity to the Site, the grounds of the communication masts and field are open in character.
- 4.23 Mature trees divide the wider field pattern to the north of the Site. To the east of the Site, there are mature trees at the junction of the B2011 and Winehouse Lane, which extend adjacent to the B2011 and around the holiday homes. There is also roadside vegetation to the south of the Site, with extensive tracts of vegetation across East Cliff and Warren Country Park. To the west of the Site, there are mature trees along PRow (public bridleway) 0052/ER252/6 and 0052/ER252/7, bordering residential land uses in Helena Road. There is also a generally well vegetated character to the residential areas.

4.24 With reference to the following visual appraisal, the extent of vegetation influences the visibility across the study area and towards the Site.

### **Public Rights of Way (PRoW) and Access**

4.25 With reference to on-line mapping<sup>3</sup> and **Figure I**, PRoW within the study area include:

- PRoW (footpath) 0052/ER241/1, 225m to the north of the Site, crossing the fields between Winehouse Lane and the A20;
- PRoW (footpath) 0052/ER242/5, 440m to the north of the Site, crossing between the recreation ground and Winehouse Lane;
- PRoW (footpath) 0052/ER242/2 and 0052/ER242/3, 240m to the north of the Site, crossing between Winehouse Lane and the A20;
- Sandwich to Rye cycle ride (along the Old Dover Road), 230m to the south of the Site;
- PRoW (footpath) 0052/ER246/13 (also forming part of the Saxon Shore Way, England Coast Path and North Downs Way National Trail), 235m to the south of the Site; and
- PRoW (public bridleway) 0052/ER252/6 and 0052/ER252/7, 190m to the west of the Site, extending adjacent to residential land uses to the north and south of the B2011.

### **Designations**

4.26 As set out in previous chapter, the Site is within the Kent Downs AONB. Relevant publications are set out in the following chapter.

4.27 There are neither Conservation Areas nor listed buildings in proximity to the Site.

4.28 The Heritage Coast is 230m to the south of the Site, which consists of several ecological designations, including local nature reserves and SSSI's across The Warren and East Cliff and Warren Country Park.

### **Character of the Night Sky**

4.29 The Campaign for the Protection of Rural England on-line mapping<sup>4</sup>, illustrates the level of radiance (night-lights) that shine up into the night sky. The following extract from the on-line mapping illustrates the Site (red dot) as being within an area of 'brighter' night sky, via the yellow hatching, reflecting the night-sky across Capel-le-Ferne. The 'darker' night skies extend to the north of the Site (via the green hatch) and extend across the remainder of the study area and AONB, where the 'darkest' night skies are recorded by the mapping.

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<sup>3</sup> Kent County Council, on-line PRoW mapping, <https://www.kent.gov.uk/environment-waste-and-planning/public-rights-of-way/rights-of-way-map>

<sup>4</sup> Campaign for the Protection of Rural England, <https://www.nightblight.cpre.org.uk/maps/>



Image 4-1: Extract of the Campaign for the Protection of England night-sky mapping with the centre of the Site illustrated via a red dot

- 4.30 From the fieldwork the Site is not lit. There is lighting within residential land uses to the east and south of the Site, along with lighting along the B2011 via lighting columns and vehicle headlights.
- 4.31 The Site is therefore not within an inherently darker night sky area, like most of the AONB. The Site is assessed as being within an E3: Suburban Area.

## 5.0 THE KENT DOWNS AONB

5.1 The following sections sets out documents relevant to the LVA.

### **Kent Downs AONB Management 2021-2026<sup>5</sup>**

5.2 The AONB Management Plan sets out the special characteristics and qualities of the AONB and identifies the key issues, opportunities and threats facing the AONB.

5.3 The stated special landscape components, characteristics and qualities of the Kent Downs AONB are:

- Dramatic landform and views, including the south-facing scarp slope and long distance panoramic views;
- Biodiversity rich habitats, particularly chalk downland;
- Farmed landscape, reflecting the long established land use;
- Woodland and trees, reflecting the high percentage of ancient woodland across the AONB;
- A rich legacy of historic and cultural heritage, covering past settlements and artistic association;
- The Heritage Coast, covers the shoreline either side of Dover and the White Cliffs;
- Geology and natural resources, including the chalk, soils and water aquifers; and
- Tranquillity and remoteness, including for dark night skies and the important perceptual qualities of the AONB.

5.4 The stated main issues, opportunities and threats to the landform and landscape character include loss and damage to the character via poorly designed development; urban fringe impacts through recreational pressure and climate change.

5.5 The stated landform and landscape character principles are:

- *“LLC1: The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued;*
- *LLC2: The promotion, management, restoration and appropriate creation of viewpoints will be supported;*
- *LLC3: The provision of co-ordinated and high-quality landscape conservation guidance will be pursued, focusing on the special characteristics and qualities, natural beauty and the landscape character of the Kent Downs AONB;*
- *LLC4: The prevention, detection and enforcement action against illegal and overtly damaging activities which detract from landscape character will be pursued;*
- *LLC5: The revised Kent Downs AONB Landscape Character Assessment forms an integral interconnected, component part of the AONB Management Plan*

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<sup>5</sup> Kent Downs AONB Management Plan, <https://kentdowns.org.uk/wp-content/uploads/2021/11/The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf>

*and should be used to inform proposals and land management impacting the AONB;*

- *LLC6: The improved awareness and appreciation of all the special qualities of the Kent Downs AONB landscape and its conservation to people who influence the future of, live, work in or visit the AONB will be pursued; and*
- *LLC7: The development of strategic, long-term, landscape action and enhancement plans for areas of the Kent Downs AONB which present the greatest threats or opportunities or where natural capital enhancement, intended net gain, nature recovery, ELM or climate mitigation investments are proposed, will be pursued.”*

#### 5.6 Stated sustainable development principles include:

- *“SD1: Ensure that policies, plans, projects and net gain investments affecting the Kent Downs AONB take a landscape led approach are long term, framed by the Sustainable Development Goals appropriate to the Kent Downs, cross cutting and recurrent themes, the vision, aims and principles of the AONB Management Plan;*
- *SD2: The local character, qualities, distinctiveness and natural resources of the Kent Downs AONB will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements;*
- *SD3: Ensure that development and changes to land use and land management cumulatively conserve and enhance the character and qualities of the Kent Downs AONB rather than detracting from it;*
- *SD8: Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB; and*
- *SD9: The particular historic and locally distinctive character of rural settlements and buildings of the Kent Downs AONB will be maintained and strengthened. The use of sustainably sourced locally-derived materials for restoration and conversion work will be encouraged. New developments will be expected to apply appropriate design guidance and to be complementary to local character in form, siting, scale, contribution to settlement pattern and choice of materials.”*

#### **Kent Downs AONB Landscape Character Assessment, 2020<sup>6</sup>**

#### 5.7 The reference to the following extract of the published study, the Site is located in Landscape Character Area IC: East Kent Downs (LCA IC) and the small sub-area Alkham. The stated relevant key characteristics of LCA IC are:

- *“Rounded chalk plateau dissected by a series of parallel narrow dry valleys, becoming increasingly pronounced towards the south;*
- *Dominant land use is arable agriculture, but there are also areas of parkland, orchards, vines, woodland and pasture. Field patterns are variable, but are generally larger on ridges than in valleys, reflecting historic processes of enclosure;*
- *Relatively sparse settlement of scattered farms and occasional nucleated villages, often of brick and flint construction. Concentration of settlement in*

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<sup>6</sup> Kent Downs Landscape Character Assessment, <https://kentdowns.org.uk/landscape-character-assessment-2020/>

*the Nail Bourne Valley, and notable common-edge settlement of Stelling Minnis;*

- *A relatively tranquil part of the Kent Downs AONB, with a strongly rural feel. The pattern of ridges and dry valleys gives the landscape a rhythmic feel, particularly in the south of the LCA; and*
- *Views are often linear and channelled by landform. There are long views from high ground, overlooking adjacent valleys.”*



Image 5-1: Extract of the AONB Landscape Character Assessment, with the Site illustrated via a red dot

5.8 The published description of sub-area Alkham includes:

*“This area is dominated by the long parallel ridges and sometimes isolated valleys which feed into the Dour valley. Near the coast, the ridges become increasingly narrower and the valleys closer.”*

5.9 The stated sensitivities in relation to development are:

*“Development which is of a scale or type that does not sit comfortably within the AONB landscape is largely confined to the peripheries of this LCA, particularly around Hawkinge and on the edge of Dover, although there have been large-scale development proposals elsewhere, such as at Bridge. Such developments risk undermining the area’s rural nature, and the distinctive character of its buildings. Linear expansion of valley-floor settlements up the valley sides has occurred in several villages, and is noticeable within the landscape. Urbanising and urban-fringe influences are most prevalent along the main roads within the area, particularly around larger settlements. These can reduce the rural character, and also introduce elements which are not designed to be locally-distinctive.”*

5.10 The ‘aspirational landscape strategy’ includes:

*“Any visual and landscape impacts from surrounding urban areas, main roads and new developments are kept to a minimum through high quality design and careful land management. Development within the LCA is at a scale and of a quality that does not detract from, and seeks to conserve and enhance, the character and qualities of the area.”*

5.11 Relevant ‘protect’ guidelines are

- *“Protect the small scale, isolated pattern and rural character of settlements within this LCA. Avoid ribbon development along roads and large scale development;*
- *Protect skylines and consider the impacts of new developments (including communications masts) on open skylines;*
- *Protect trees and woodlands, particularly where they have a screening function;*
- *Protect open views and long views along valleys, avoiding the introduction of new developed elements into these views; and*
- *Protect tranquillity, resisting developments which increase levels of noise and movement in the landscape, and maintain the remote, undeveloped qualities of the valley.”*

5.12 Relevant ‘manage’ guidelines are:

*“Enhance ecological connectivity in arable areas, for example through provision of field margin strips and re-connecting hedgerows.”*

5.13 Relevant ‘plan’ guidelines are:

- *“Promote high design standards for rural developments to ensure that they make a positive contribution to landscape character, for example through careful choice of materials, and an appropriate scale and massing of building. Seek the sympathetic use of local materials – brick, tile and flint; and*
- *Ensure that high quality design of settlement edges is integrated into any plans for development within the LCA or on its periphery.”*

**Kent Downs AONB guidance on the Selection and Use of Colour in Development<sup>7</sup>**

5.14 The guidance sets out colourways and palettes as examples of how to select harmonious and interesting colour tones on building elevations. In terms of the Chalk Downs (which covers the Site), the recommended colours are various shades of green and dark hues, along with some lighter greys and cream tones.

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<sup>7</sup> Kent Downs AONB, Guidance on the selection and use of colour, <https://kentdowns.org.uk/wp-content/uploads/2020/07/KDAONB-Colour-guidance-final-SCREEN.pdf>

### **Kent Downs AONB Landscape Design Handbook<sup>8</sup>**

5.15 The handbook provides design guidance to contribute to the conservation and enhancement of the special characteristics of the AONB as a whole, and the distinctiveness of its individual character areas, along with suggestions for new planting.

5.16 The stated relevant key characteristics of the East Kent Downs are:

- *“Long wooded ridges;*
- *Dry valleys with open valley bottoms;*
- *Extensive coppice and conifer woodlands;*
- *Coastal downs;*
- *Thick shaws or overgrown hedges on the valley sides;*
- *Narrow uncultivated banks or ‘shaws’. Tiny remote settlements incorporating traditional building materials (flint, brick and tile);*
- *Large arable fields on ridge-top plateaux;*
- *Maze of sunken one-track lanes; and*
- *Scattered military remains, e.g. pill boxes and gun emplacements*

5.17 The stated overall landscape character objectives relevant to the Site are:

- *“To maintain the existing woodland cover, increasing the proportion of deciduous woodlands and to restore the hedgerow network.”*

5.18 Relevant design guidelines for Alkham are:

- *“Conserve and manage existing woodlands;*
- *Avoid ribbon development along existing roads in the lower valleys and integrate with new hedgerow/hedgerow tree planting; and*
- *Seek the use of sympathetic local materials – brick, tile and flint.”*

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<sup>8</sup> Kent Downs AONB, Landscape Design Handbook, <https://kentdowns.org.uk/wp-content/uploads/2018/04/Landscape-Design-Handbook.pdf>



## 6.0 PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS

6.1 The Site is covered by several published landscape character assessments and related studies, with the relevant aspects summarised below and set out in full in **Appendix II**.

### National

Natural England, National Character Area 119: North Downs (NCA 119)

6.2 With Site and study area are covered by NCA 119, which is an extensive area of land extending between Surrey and Dover. The Site is located at the southern of NCA 119, between Folkestone and Dover. The settlement pattern is described as:

- *“traditional small, nucleated villages, scattered farms and large houses with timber framing, flint walls and Wealden brick detailing. Twisting sunken lanes, often aligned along ancient drove roads, cut across the scarp and are a feature of much of the dip slope.”*

6.3 Stated key characteristics relevant to the Site and study area are:

- *“Cretaceous Chalk forms the backbone of the North Downs. A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France; and*
- *The North Downs end at the dramatic White Cliffs of Dover, one of the country’s most distinctive and famous landmarks. Most of the coast between Kingsdown and Folkestone is unprotected, allowing for natural processes. The cliffs are home to internationally important maritime cliff-top and cliff-ledge vegetation.”*

6.4 Relevant Statements of Environmental Opportunity (SEO) are:

- *“Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area’s rich cultural and natural heritage, famous landmarks and views for future generations (SEO 1); and*
- *Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs (SEO 4).”*

### Landscape Assessment of Kent LCA Alkham: East Kent Downs, 2004<sup>9</sup>

6.5 With reference to the following extract of the published study and **Appendix II**, the Site and study area is covered by LCA Alkham: East Kent Downs (the light brown hatch).

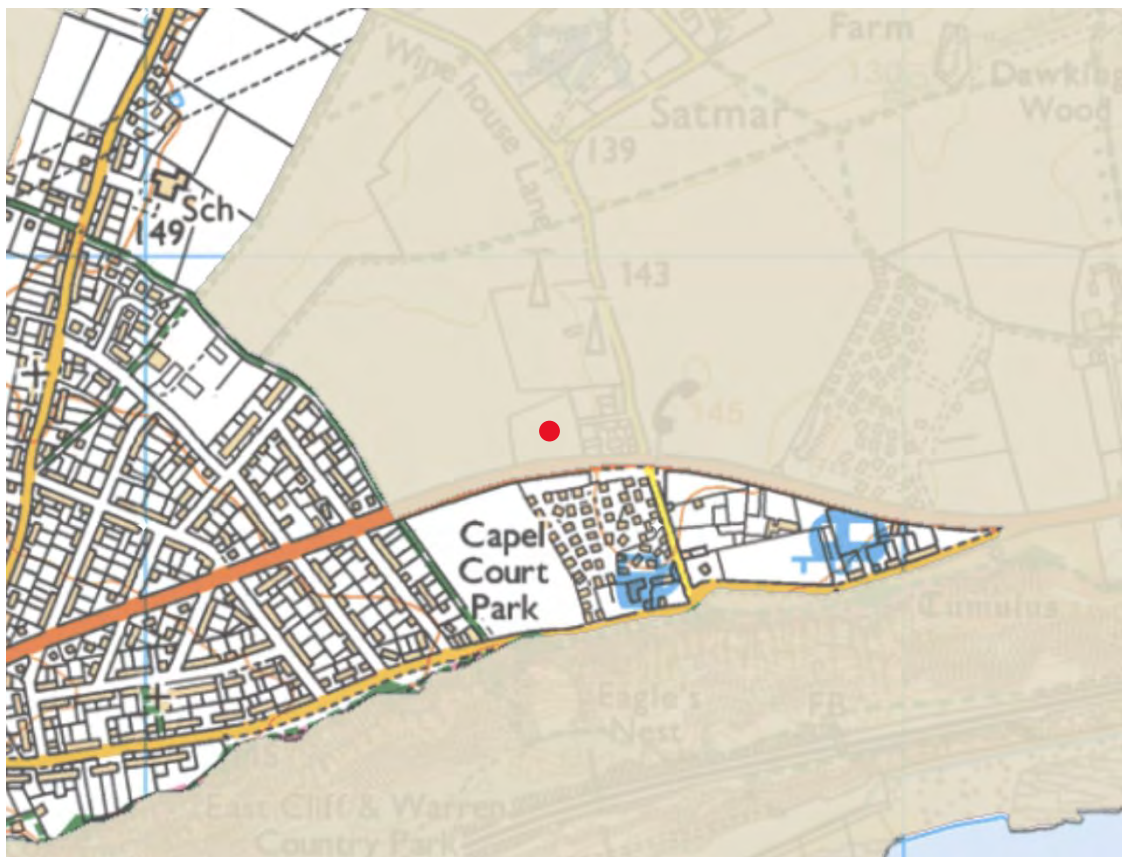


Image 6-1: Extract of the Kent Landscape Character Assessment, with the Site located by the red dot

6.6 The published study describes LCA Alkham East Kent Downs as:

*“...The countryside here is criss-crossed by a maze of tiny, sunken, one-track lanes. Houses are widely scattered and many villages, traditionally built of local flint, brick and tile, are still little more than a church, a manor and a pair of farm cottages - an important characteristic of this landscape...”*

6.7 The stated key characteristic features of the LCA are:

- “Long ridges and isolated valleys, formerly and ancient unenclosed landscape;
- Some woodland and high nature conservation value on steeper valley slopes;
- Costal downs, open hill-top fields, wild with pockets of scrub.”

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<sup>9</sup> Kent County Council, Landscape Assessment of Kent, <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/countryside-policies-and-reports/kents-landscape-assessment>

6.8 The published study concludes that the condition of the LCA is ‘*moderate*’, due to coherent pattern of elements, some detracting features, including residential areas and a moderate ecological integrity. The sensitivity of the LCA is also assessed as ‘*moderate*’, due to the apparent landform, intermittent tree cover and moderate visibility.

6.9 The stated landscape actions are based on a strategy of ‘*conserve and create*’ and include:

*“Create a new pattern for development of existing settlements along existing access routes in the lower valleys.”*

6.10 From the above, the Site is not representative of the key characteristic features due to being formerly developed land and adjacent to residential land uses.

### **District**

Dover Landscape Character Assessment, 2020<sup>10</sup>

6.11 The Site was not included in the assessment, due to being within the AONB.

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<sup>10</sup> Dover District Council, Landscape Character Assessment,  
<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/landscape-character-assessment-2020.pdf>

## 7.0 VISUAL BASELINE

7.1 As set out in the methodology, the LVA includes an assessment of the likely changes to people's views (visual receptors) due to the Proposed Development. The identification of people's views is based upon a representative range of differing groups, e.g. residents, recreational users or road users.

7.2 The identification of representative views is a two stage process, which as set out below, includes desk-based reviews and fieldwork from publicly accessible locations.

### Stage 1: Zone of Theoretical Visibility (ZTV) Mapping

7.3 With reference to **Figure 2**, a ZTV was generated to review the theoretical visibility of the Proposed Development. The ZTV modelled the proposed block massing within the Site at 10m in height. Due to the Site's proximity to residential land uses, these buildings have also been included in the ZTV, with information sourced from OS Open Map Local. This on-line information also includes broad areas of existing vegetation.

7.4 **Figure 2** indicates that the theoretical visibility of the Proposed Development extends:

- Consistently across rising landform to the north of the Site, culminating at the A20, 1km to the north of the Site;
- Consistently across undulating land to the east of the Site and concentrated to within the A20, 1.2km to the east of the Site, before becoming intermittent at the eastern edge of the study area;
- Intermittently to the south of the Site, culminating at the ridgeline line along the Old Dover Road, 230m to the south of the Site; and
- To the residential edge of Capel-le-Ferne, 190m to the west of the Site, along with channelled inter-visibility along the B2011, to the western edge of Capel-le-Ferne.

### Stage 2: Fieldwork

7.5 Fieldwork has been undertaken from publicly accessible locations in October 2023 to review the ZTV and identify a representative range of visual receptors (people's views) with corresponding photography from publicly accessible locations (viewpoints). The locations of these viewpoints are illustrated on **Figure 2** via a numbered blue dot. The following section summarises the views in relation to the photographs presented in **Figure 3**. As the fieldwork was undertaken whilst deciduous vegetation was still in leaf, the summaries also account for winter conditions, when this vegetation is not in leaf.

7.6 **Viewpoints 1** is located on the B2011, 475m to the west of the Site and is representative of road users and oblique views of residents. The view demonstrates that there are channelled views of the vegetation along the western edge of the Site, located in the background of the view. The Site is seen

in a residential context, along with the lighting columns adjacent to the B2011 and the communication masts beyond the Site. There is no inter-visibility with the AONB beyond the Site, nor any perception of the wider rural landscape, such that the Site is seen as an inherent part of a residential area. The composition of the view is considered to remain similar in winter conditions, due to the density of the intervening vegetation and channelled alignment of the view.

- 7.7 Moving towards the Site, **Viewpoint 2** is also located on the B2011, 75m to the west of the Site. The view is representative of road users, residents and recreational users on PRow (public bridleway) 0052/ER252/7, which connects with the B2011. The view demonstrates that the vegetation along the western edge of the Site is visible, and the density of this vegetation screens views beyond the Site, except for the tall communication masts. The Site is seen in the context of residential land uses adjacent to the B2011, along with properties at Satmar Holiday Park, also within the AONB. The boundary vegetation at the Site visually separates it from the rural fields in the AONB across the foreground of the view on the opposite side of the B2011. In winter, the composition of the view would be similar, due to the open character of the intervening B2011, with an increased visibility across the Site due to the vegetation not being in leaf.
- 7.8 **Viewpoint 3** is located on the B2011, 200m to the south-east of the Site and is representative of road users. The view demonstrates that there are channelled views of the boundary vegetation on the south-east edge of the Site, which forms part of the tract of roadside vegetation extending across the composition of the view. The remainder of the Site is screened by the foreground roadside vegetation. The Site is seen in the context of residential properties adjacent to the Site, as well as the B2011 infrastructure. The Site is not seen as part of the wider rural land use within the AONB and forms a very small part of the wider view. The composition of the view is considered to remain similar in winter conditions, due to the density of the intervening vegetation and channelled alignment of the view.
- 7.9 **Viewpoint 4** is located on the PRow (footpath) 0052/ER246/13, 240m to the south of the Site. The view is representative of recreational users. The Site is not discernible due to the lower lying position of the PRow. Views extend through residential areas to the north of the Old Dover Road, such that there is already a notable residential context to the composition of views. The main focus of the view is considered to be southwards, away from the Site, across the coast. The composition of the view is considered to remain similar in winter conditions, due to the intervening landform and land uses.
- 7.10 **Viewpoint 5** is located on PRow (bridleway) 0052/ER252/7, 230m to the west of the Site. The view is representative of recreational users and oblique views from residents to the west of the PRow. The view demonstrates that the Site is seen in the context of residential land uses, both adjacent to the B2011 and at Little Satmar Holiday Park and the communication masts within the AONB. The vegetation along the western edge of the Site truncates longer distance views, which along with the low lying landform and vegetation across the composition of the view negate any wider visual perception of the AONB. The Site is therefore seen in the context of existing development within the

AONB and in a part of the AONB which is evidently a transitional area between the wider AONB and residential land uses in Capel-le-Ferne. The composition of the view is considered to remain similar in winter conditions, due to the open character of the intervening field, with some additional visibility across the Site due to the deciduous vegetation not being in leaf.

- 7.11 **Viewpoints 6 and 7** are taken from along PRoW (footpath) 0052/ER241/1, between 230m and 560m from the Site respectively. The views are representative of recreational users and demonstrate that in closer proximity to the Site, the Site is seen in the immediate context of residential land uses. At distance from the Site, the intervening vegetation screened views of the Site, but the developed context remains via views of residential properties and the communication masts. The composition of the view is considered to remain similar in winter conditions, due to the open character of the intervening field, with some additional visibility across the Site from Viewpoint 6, due to the deciduous vegetation not being in leaf, along with an increased visibility of residential land uses adjacent to the B2011.
- 7.12 **Viewpoint 8** is taken from PRoW (footpath) 0052/ER242/5, 505m to the north of the Site and is representative of recreational users. The view demonstrates that intervening vegetation largely truncates views across the wider landscape, but the Site's boundary vegetation is visible from parts of the PRoW. The extent of intervening vegetation softens views of residential land uses adjacent to the B2011, whilst the coms masts remain visible due to their height above the intervening vegetation. The Site's boundary vegetation forms a defined edge to the fields within the AONB, such that the Site is not perceived as being within the AONB. The composition of the view is considered to remain similar in winter conditions, due to the open character of the intervening field, with some additional visibility across the Site due to the deciduous vegetation not being in leaf.
- 7.13 **Viewpoint 9** is taken from PRoW (footpath) 0052/ER242/6, 470m to the north-west of the Site. The view is representative of recreational users and demonstrates that the Site is not visible. The Site would remain not visible in winter conditions due to the density of the intervening vegetation.
- 7.14 **Viewpoints 10 and 11** are taken from PRoW (footpath) 0052/ER242/2, 700m and 830m to the north-east of the Site, from relatively elevated land in the AONB. The views are representative of recreational users and demonstrate that the visibility of the Site is varies. Where visible, the Site is seen in the context of residential land uses which form a defined edge to the AONB. The composition of the view is considered to remain similar in winter conditions, with some additional visibility across the Site due to the deciduous vegetation not being in leaf.

### **Visual Summary**

- 7.15 From the above fieldwork, the Site's boundary vegetation is visible from surrounding PRoW and the B2011, mainly due to the open character of the intervening fields. The Site is seen in the context of residential land uses adjacent to the B2011 in views from the north and east. In views from the south

of the Site, the Site is not visible from PRow along the coast due to intervening land uses. In closer proximity to the Site and in views from the west, the Site is also seen in the context of residential land uses and properties at Satmar Holiday Park. The boundary vegetation at the Site visually separates it from the rural fields in the AONB and the Site is seen in the context of number of developments, also within the AONB.

## 8.0 LEGISLATION, POLICY AND GUIDANCE

8.1 The following section summarises the policies relevant to landscape and visual matters, and should be read in combination with **Appendix III**, which sets out the policies in full.

### LEGISLATION

8.2 There is no specific legislation relevant to landscape and visual matters.

### NATIONAL PLANNING POLICY

#### National Planning Policy Framework (NPPF), 2023

8.3 With reference to **Appendix III**, the relevant NPPF<sup>11</sup> policies are paragraphs:

- 8 - outlining that the economic, social and environmental objectives of sustainable development;
- 92 - outlining the use of street layouts which allow for easy pedestrian and cycle connections within and between neighbourhoods;
- 124 – which outlines that planning policies and decisions should support development that makes efficient use of land, taking into account promoting regeneration and change;
- 125 – which sets out area-based character assessments can be used to help ensure that land is used efficiently;
- 126 - in respect of achieving well-designed places;
- 130 – requiring planning decisions to ensure that development will function well and add to the overall quality of the area, including being visually attractive and sympathetic to local character and history;
- 131 – in relation to the importance of trees within development;
- 132 – requiring early consideration of design quality and engagement with communities;
- 134 – which sets out that significant weight should be given to development which promotes high levels of sustainability and help raises the standard of design in an area, as long as they fit in with the overall form and layout of the area;
- 174 – requiring planning decisions to contribute to and enhance the natural and local environment;
- 175 – requiring plans to distinguish between a hierarchy of sites and allocate land with the least environmental or amenity value;

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<sup>11</sup> Department for Levelling Up, Housing and Communities, NPPF, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



- 176 – which sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in AONB's and that the scale and extent of development within these areas should be limited; and
- 177 – which sets out that applications within an AONB (specifically for major development) should include an assessment of the effect on the landscape and recreational opportunities and the extent to which these could be moderated.

### **National Planning Policy Guidance (PPG)**

8.4 The following PPG are relevant to landscape and visual matters:

- Design: process and tools (2019<sup>12</sup>), which explains the processes and tools that can be used through the planning system and how to engage local communities effectively;
- Light Pollution (2019)<sup>13</sup>, which advises on how to consider light within the planning system;
- Natural Environment (2019)<sup>14</sup>, which explains key issues in implementing policy to protect and enhance the natural environment, including green infrastructure and biodiversity.

### **National Design Guide, 2021**

8.5 This guide<sup>15</sup> illustrates how well-designed places can be achieved in practice, based upon ten characteristic 'themes', including context, identity and nature.

### **REGIONAL PLANNING POLICY**

8.6 There is no regional planning policy relevant to landscape and visual matters.

### **LOCAL PLANNING POLICY**

#### **Dover District Local Plan to 2040**

8.7 The Dover District Local Plan to 2040 was submitted to the Secretary of State on 31<sup>st</sup> March 2023.

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<sup>12</sup> Department for Levelling Up, Housing and Communities, PPG Design, <https://www.gov.uk/guidance/design>

<sup>13</sup> Department for Levelling Up, Housing and Communities, PPG Light Pollution, <https://www.gov.uk/guidance/light-pollution>

<sup>14</sup> Department for Levelling Up, Housing and Communities, PPG Natural Environment, <https://www.gov.uk/guidance/natural-environment>

<sup>15</sup> Department for Levelling Up, Housing and Communities, <https://www.gov.uk/government/publications/national-design-guide>

8.8 This Local Plan<sup>16</sup> sets out the vision, strategic objectives and overarching development strategy for future growth in the District, with the Site allocated via SAP45 (CAP011). The supporting policy text states:

*“Existing trees and hedgerows along the boundary of the site should be retained and enhanced.*

*The Site is in the AONB and any scheme coming forward should be designed to be appropriate to the sites sensitive location within the Kent Downs AONB in respect of scale, form, materials and colour palette.*

*Existing trees and hedgerows along the boundary of the site should be retained and enhanced and an appropriate landscape buffer is required along the northern and western boundaries of the site to mitigate the impact of development on the AONB.”*

8.9 With reference to **Appendix III**, the relevant Strategic Policies (SP) are:

- SP1: Planning for Climate Change, which sets out measures for new development to mitigate and adapt to climate change;
- SP2: Planning for Healthy and Inclusive Communities, which includes for all new development to achieve a high quality design and include new green infrastructure;
- SP3: Housing Growth, which sets out provision for additional homes in the district, including via allocated sites;
- SP4: Residential Windfall Development, which permits development within a number of settlements, subject to a range of criteria, including conserving and enhancing the existing landscape character;
- SP14: Enhancing Green Infrastructure and Biodiversity, which sets out that new development will be required to improve the wider ecological networks; and
- SP15: Protecting the District’s Historic Environment, which sets out existing assets should be conserved and enhanced.

8.10 With reference to **Appendix III**, the relevant Development Management Policies are:

- CCI: Reducing Carbon Emissions, in respect of reducing carbon emissions;
- CC2: Sustainable Design and Construction, to ensure new development adhere to principles of sustainable design and climate change;
- CC3: Renewable and Low Carbon Energy Development, whereby development should not result in significant harm to the landscape character;

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<sup>16</sup> Dover District Council, Dover District Local Plan to 2040, <https://www.doverdistrictlocalplan.co.uk/uploads/Submission-Documents/SD01-Dover-District-Local-Plan-to-2040-Regulation-19-Submission-Document-Oct-22.pdf>

- CC8: Tree Planting and Protection, in respect of protecting existing trees and increasing the number of additional planted trees;
- PM1: Achieving High Quality Design, Place Making and provision of Design Codes, to ensure new developments are of the highest quality;
- PM2: Quality of Residential Accommodation, which sets out a range of measures for new residential development;
- PM3: Providing open Space, which sets out quantity and access standards;
- NE1: Biodiversity Net Gain, which sets out requirements for new development in respect of biodiversity net gain;
- NE2: Landscape Character and the Kent Downs AONB, in respect of new development respecting and reflecting the character of the landscape in which it is located; and
- HE1: Designated and Non-designated Heritage Assets, regarding conserving and enhancing existing assets.

### **Dover District Council Core Strategy, 2010**

8.11 The Core Strategy<sup>17</sup> sets out the Council's overall ambitions and priorities for the District, which include creating a coherent network of green infrastructure.

8.12 The relevant 'drivers for change / key elements to respond to' include:

- *"climate change; and*
- *Place-shaping - commercial pressures can easily result in development that lacks individuality and sense of place. Cumulatively this can erode the character of an area. The Strategy needs to ensure that development creates or reinforces an appropriate sense of place and local distinctiveness through design and quality measures..."*

8.13 The relevant policies are:

- CP4: Housing Quality, Mix, Density and Design;
- CP7: Green Infrastructure Network;
- DMI: Settlement Boundaries, whereby development will not be permitted on land beyond the urban boundaries and rural settlement confines;
- DMI5: Protection of the Countryside; and
- DMI6: Landscape Character.

8.14 In respect of Policy DMI6: Landscape Character, this states:

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<sup>17</sup> Dover District Council, <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Adopted-Core-Strategy.pdf>

*“Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:*

*i. It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*

*ii. It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.”*

### **Saved Policies of the Dover District Local Plan 2002**

8.15 The following saved policies are relevant to landscape and visual matters:

- AY7: Open Space and Landscaping;
- CO8: Development which would adversely affect a hedgerow; and
- ER6: Light Pollution.

### **Representations to the Local Plan**

8.16 The AONB response to the consultation<sup>18</sup> on the Site’s draft allocation was:

*“The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9. The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George’s Close on the opposite side of New Dover Road, it is considered all the more important to retain. While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago. The site has reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF. As such, it is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.”*

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<sup>18</sup> <https://dover-consult.objective.co.uk/kse/event/37116/peoplesubmissions/section/s16432152338465?consultation=s16432152338465>

## 9.0 LIKELY LANDSCAPE AND VISUAL EFFECTS

9.1 The following section sets out an assessment of the likely landscape and visual effects of the Proposed Development. The assessment assumes new residential land uses within the Site, as illustrated on the following sketch layout plan.



Image 9-1: Sketch Layout Plan

- 9.2 The sketch layout plan illustrates ten new dwellings within the Site, offset from the existing boundary vegetation along the western and northern edges of the Site by 10m and from the boundary vegetation on the eastern edge by 3m.
- 9.3 The layout enables a strong sense of place by creating an enclosed space through the dwellings facing away from the B2011. The proposed access point utilises the existing access into the Site.
- 9.4 Other aspect of the Proposed Development would include a high quality design, due to responding to policy requirements. This would include design measures to control new lighting levels and any potential light spillage. There would also be new native planting within the proposed buffers and the colour facades of the dwellings would be informed by the AONB colour studies for development.
- 9.5 These measures are accounted for in the following assessment.

## **Landscape Effects**

### The Site

- 9.6 At the Site level, there would be an obvious and inevitable change in character due to the new residential land use in comparison to the existing derelict character of the Site. The Proposed Development would introduce ten new buildings within a Site which was in part previously developed land. The alterations to surface landform would be localised and limited, as the Site is generally flat and has areas of existing hardstanding from the former filling station. Therefore the underlying pattern of flat landform across the Site would remain.
- 9.7 The internal ruderal vegetation would be removed, but this is considered to be of very low landscape value. The pertinent matter is that the Site's boundary vegetation would be retained and reinforced with new planting, thereby retaining and enhancing the key landscape feature of the Site.
- 9.8 The new buildings would be of a high architectural design, to reflect policy requirements. Their design would also reference the AONB's guidelines in the use of colour, so that the proposed façade treatments would be consistent with the recommendations for the East Kent Downs and Alkham.
- 9.9 Given the obvious change to the Site's character, the change would be high. In relation to the medium sensitivity of the Site, the effects would be major adverse in the early phases of the Proposed Development in winter. With the establishment of the proposed planting and the increased integration between the new buildings and the external landscaping, the effects would reduce to moderate adverse in summer.
- 9.10 These high tiers of effect at the Site level are common place for residential development and are not specific to the Site. The pertinent matters are that there would be no loss of the key boundary vegetation, changes to landform would be limited and the new buildings present the opportunity to introduce high quality architecture within the Site. The predicted effects would also reduce in time with the establishment of the proposed planting and the vegetation in leaf.

### Published Landscape Character Assessments

- 9.11 In relation to NCA 119: North Downs (NCA 119), the Proposed Development would reflect the existing settlement pattern, by forming a very small extension of residential land uses on the northern side of the B2011, whilst remaining consolidated between the B2011 and the communication masts. The scale and extent of the Proposed Development would mirror that of residential land uses to the east of the Site, and the retention of the boundary vegetation would ensure a high degree of physical and visual containment to the proposed buildings, reflecting that to the south-west of the Site at George's Close. The very small scale of the Proposed Development would not alter any of the stated key characteristics of the NCA and therefore there would be no change to the character of the NCA and no effects from the Proposed Development.

- 9.12 In relation to Kent's LCA Alkham: East Kent Downs, the Proposed Development would not alter any of the stated key characteristics features. The Proposed Development would respond positively to the stated strategy of 'conserve and create' via locating new development along existing access routes (i.e. the B2011). As per NCA 119, the very small scale and extent of the Proposed Development and its location at Capel-le-Ferne would not alter the character of the wider geographic area of LCA Alkham: East Kent Downs. Therefore, there would be no effects from the Proposed Development.

### **Visual Effects**

- 9.13 For road users on the B2011 and residents at distance to the west of the Site (**Viewpoint 1**), the upper parts of the proposed buildings and roofscape would be softened by the retained vegetation around the perimeter of the Site. The Proposed Development would be seen in the context of residential and transport land uses and form a very small change to the composition of the view, such that the change would be very low. In relation to the low sensitivity of these receptors, the effects are predicted to be negligible adverse in winter and summer conditions.
- 9.14 In closer proximity to the Site, along the B2011 (**Viewpoint 2**) the upper parts of the proposed buildings and roofscape would be visible, with the remainder of the buildings screened by the retained vegetation. The Proposed Development would be seen in the context of a range of developments within the AONB and in the direct context of residential properties adjacent to the B2011. There would be low degree of change to the composition of the view. In relation to these low sensitivity receptors, the Proposed Development would result in minor adverse effects in winter and negligible adverse effects in summer.
- 9.15 From the eastern approach to Capel-le-Ferne (**Viewpoint 3**), views of the Proposed Development would be largely softened by the retained vegetation around the perimeter of the Site. The Proposed Development would be seen in the context of residential land uses and represent a very small change to the composition of the view. This very low change in relation to the low sensitivity of the receptors would result in negligible adverse effects in winter and summer.
- 9.16 From PRow (footpath) 0052/ER246/13 (**Viewpoint 4**), to the south of the Site, the Proposed Development would not be visible, due to the distance and intervening buildings. Therefore, there would be no change to the composition of the view and no effects in winter or summer.
- 9.17 For recreational users on PRow (bridleway) 0052/ER252/7 (**Viewpoint 5**), to the west of the Site, the upper parts of the facades and roofscape of the proposed buildings would be visible, seen in the context of existing development within the AONB and adjacent to the B2011. The Proposed Development would form a visual link to residential development on the southern side of the B2011. The scale of change within the view would be small, with the main focus of the view across the remainder of the AONB remaining. This low degree of change in relation to the high sensitivity of the receptors is predicted to result in a moderate adverse in winter, reducing to minor adverse in summer.

- 9.18 For recreational users on PRoW (footpath) 0052/ER241/1, (**Viewpoints 6 and 7**) the upper parts of the facades and roofscape would be visible, but seen in the immediate context of residential land uses adjacent to the B2011, the communications masts and Winehouse Lane. With increased distance from the Site, the intervening vegetation would screen views the Proposed Development. With the Proposed Development representing a small change to the composition of the view, the change to these high sensitive receptors would be minor adverse in winter, reducing to negligible adverse in summer.
- 9.19 For recreational users on PRoW (footpath) 0052/ER242/5 (**Viewpoint 8**), the Site's boundary vegetation would screen most of the lower parts of the proposed buildings within the Site. The upper parts of the façade and roofscape would be visible, forming a greater extent of residential land uses within the composition of the view in comparison to views of buildings adjacent to the B2011. The overall change to the composition of the view would be small, and at distance from the Site. The small change in relation to the high sensitivity of the receptors would result in a moderate adverse effect in winter and a minor adverse effect in summer.
- 9.20 For recreational users on PRoW (footpath) 0052/ER242/6 (**Viewpoint 9**), the Proposed Development would not be visible due to the density of the intervening vegetation. Therefore, there would be no change to the composition of the view and no effects in winter or summer.
- 9.21 For recreational users on PRoW (footpath) 0052/ER242/2 (**Viewpoints 10 and 11**), the upper parts of the proposed roofscape would be visible from more elevated parts of the PRoW. The combination of the distance and that the Proposed Development would be seen in the context of existing residential land uses would result in a very low degree of change. In relation to the high sensitivity of these receptors, the effects would range between minor adverse and negligible adverse in winter and negligible adverse and neutral in summer.

### **Character of the Night Sky**

- 9.22 The Proposed Development would introduce new lighting within the Site. However, with the incorporation of design measures to minimise light spillage, the very small scale of the Proposed Development would not alter the wider character of the night sky. Therefore, there would be no change to the E3: Suburban environmental lighting zone.

### **Kent Downs AONB**

- 9.23 The Proposed Development would result in a very small scale addition of new residential land uses within the AONB. This change would occur at the edge of the AONB, and in a part of the AONB where there are residential, transport and infrastructure land uses.
- 9.24 The Proposed Development would be located on land which is not representative of the special qualities of the AONB and is in part, previously developed land.



- 9.25 In respect of LCA IC: East Kent Downs (LCA IC), the Proposed Development would not alter any of the stated key characteristics, due to being located adjacent to residential land uses, rather than being part of the wider field patterns. The Proposed Development would not be located in a tranquil part of the AONB nor a part of the AONB where there are long views, such that the visibility of the Proposed Development would be localised.
- 9.26 In relation to the stated sensitivities to development within the AONB, the Proposed Development would reflect the scale and extent of adjacent residential land uses. Therefore, the Proposed Development would be of a scale and type which sits comfortably within the AONB landscape, confined to the periphery of the designation. The Proposed Development would not undermine the rural nature of LCA IC, as the Site's boundary vegetation already forms a physical and visual buffer from the surrounding fields. In addition, the Proposed Development would be located adjacent to the B2011, which as a main road is noted by the published study as an area of urban-fringe influences.
- 9.27 The low tiers of visual effects and no landscape effects (beyond the Site level) would conform with the stated '*aspirational landscape strategy*' for the AONB, via minimising landscape and visual impacts. The high quality of the design and the retention of the boundary vegetation (in accordance with the draft policy requirements) would ensure development which is of a quality to reflect and conserve the existing qualities of the area and AONB.
- 9.28 In relation to the stated 'protect' guidelines, the small scale of the Proposed Development would reflect the existing settlement pattern. With the Proposed Development set within the retained vegetation framework it would protect the existing trees. By being located in an area of existing development (including tall communication masts), the Proposed Development would not impact the skylines nor tranquillity of this part of the AONB.
- 9.29 The proposed introduction of new planting within the Site would respond positively to the actions of enhancing ecological connectivity within LCA IC.
- 9.30 Through the implementation of high quality design, the Proposed Development can make a positive contribution to the roadside character of the B2011 and aid in raising the design standards of the area generally in accordance with the stated 'plan' guidelines.

#### Response to the AONB Unit Local Plan Comments

- 9.31 The following section sets out the relevant matters raised by the Kent Downs AONB Unit, followed by a response.

*The site lies wholly within the Kent Downs AONB and we have concerns that the site lies separated and unrelated to existing built form at Capel-le-Ferne and that the allocation would result in new development in the countryside, that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan principle SD9.*

- 9.32 Whilst the Site is within the AONB, it is located at its periphery, such that it is not contiguous with fields in the wider AONB to the north, east and south. As a periphery location, adjacent to the B2011, it is in a part of the AONB which the AONB landscape character assessment acknowledges has urban-fringe influences.
- 9.33 The Site is not separated, nor unrelated, to existing built form at Capel-le-Fere. The Site is adjacent to residential land uses and 25m to the north-east of the settlement boundary. The Site is opposite residential land uses to the south of the B2011 and to the south of the communication masts.
- 9.34 The Site's boundary vegetation physically and visually separates the Site from the field to the west of the Site. The Site is therefore not perceived as countryside; it is perceived as derelict area of land which is well located in relation to existing residential land uses. As set out in the visual assessment, views of the Proposed Development would be very localised in relation to the AONB, and where visible the Proposed Development would be seen in the context of existing development.
- 9.35 The allocation would therefore be complementary to the local settlement pattern in the AONB, reflecting the same spatial extent as adjacent residential land uses also within the AONB.
- 9.36 The Proposed Development would not be in conflict with AONB Management Plan SD9 as there is no particular historic or locally distinctive character to this part of the AONB, nor the settlement pattern or local vernacular.
- 9.37 In accordance with SD9, the Proposed Development can be designed to achieve high quality architecture which references the relevant AONB colour and landscape guidelines. At up to two storeys in height, the Proposed Development would also complement the local character and scale of existing development within the AONB and provides the opportunity to improve the scenic quality of derelict land.

*The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at George's Close on the opposite side of New Dover Road, it is considered all the more important to retain.*

- 9.38 The Site exhibits previous development via the hard-standing in the southern part of the Site. The open character only relates to ruderal vegetation growing across low earth mounds. There is no perception of the wider fields within the AONB due to the density of the perimeter vegetation. There

is the perception of residential land uses to the east of the Site and the communication masts to the north of the Site.

9.39 The Site is derelict and in a very low condition, such that the Site does not contribute positively to the rural character of the area – its is not of a rural character. The Site does not form part of the rural setting to Capel-le-Ferne as the Site as it does not consist of fields and is physically and visually separated from the fields by the boundary vegetation.

9.40 The perception of the Site is mainly from along the B2011. When travelling east, the perception of the Site is that it is part of the residential land uses adjacent to the B2011, prior to the junction with Winehouse Lane. It is when one passes this junction and the speed limit increases, that one has the perception of leaving Capel-le-Ferne, with the setting provided by the fields on both sides of the B2011.

9.41 When travelling west, it is similarly these fields on both sides of the B2011 which provide the sense of setting to Capel-le-Ferne. The perception at arriving at Capel-le-Ferne is when one arrives at the junction with Winehouse Lane and the speed limit decreases. In combination with the Site being adjacent to residential land uses, it is therefore perceived as being within Capel-le-Ferne and not part of its setting.

*While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago.*

9.42 The aerial mapping presented in chapter 3 indicates that the filling station was located in the southern part of the Site. The fact is that the current condition of the Site is low; with the hardstanding still present, such that the Site does not contribute positively to the townscape and roadside character.

*The site has reverted to nature and the remains of permanent structures/infrastructure have blended into the landscape and as such, we do not consider that the site constitutes Previously Developed Land, as per the Glossary in Annex 2 of the NPPF.*

9.43 There is ruderal vegetation covers low mounds and areas of former hardstanding. The boundary vegetation is also established. However, this does not equate to the suggestion that the Site has reverted to nature in a positive way to the Site's character or wider AONB. The Site is of lower sensitivity as it is not representative of the special qualities of the AONB and does not contribute positively to the street scene.

*As such, it is considered that development here would be unsound as it would fail to conserve or enhance the landscape and scenic beauty of the AONB and is therefore in conflict with paragraph 176 of the NPPF. However, we do not consider the site to represent Major Development for the purposes of paragraph 177 of the NPPF.*

- 9.44 Residential development of the Site would not be unsound; it would be entirely logical in landscape and visual terms due to the Site being well located to the existing settlement pattern and at the edge of the AONB.
- 9.45 The Proposed Development would conserve and enhance the existing vegetation around the perimeter of the Site and provides the opportunity to introduce high quality design and raise the design standards of the area. The Proposed Development would therefore respond positively to AONB development policies and conserve the AONB.
- 9.46 The Proposed Development would not conflict with NPPF paragraph 176 as the scale and extent of the Proposed Development would be limited. The scale and extent of the Proposed Development would also reflect that of adjacent residential land uses, also within the AONB.
- 9.47 Notwithstanding the Proposed Development is not major development, the predicted landscape and visual effects are moderated, and reduced to low tiers of effects as demonstrated by the assessment. There is also no impact to recreational opportunities, as the Site is not publicly accessible.
- 9.48 Contrary to the AONB Unit's suggestions, the Site's allocation is considered to be justified and sound and represents a logical location for small scale residential development, as illustrated by the Sketch Layout Plan.

## 10.0 SUMMARY AND CONCLUSION

### Baseline

- 10.1 With reference to **Figure 1**, the Site is allocated for residential development within the Dover Local Plan (currently submitted for examination). The Site is adjacent to residential land uses, 25m to the north-east of the settlement boundary and opposite residential land uses which extend to the south of the B2011. The Site is therefore well located in relation to the existing settlement pattern at Capelle-Ferne.
- 10.2 The key landscape feature of the Site is its boundary vegetation, which consists of tall trees along the western and southern edges and a tall hedge along the southern edge. There are no other features of landscape value within the Site, reflecting its past land use as a former filling station, which occupied the southern part of the Site.
- 10.3 **Figure 1** also demonstrates that the Site at the edge of the Kent Downs AONB, and in a part of the AONB which is not undeveloped, with the Site adjacent to residential land uses which extend 90m northwards from the B2011, to the same extent as the Site. In addition, the Site is also in a part of the AONB where there are several holiday homes and two tall communications masts, which result in a developed character to this part of the AONB. The Site is considered not to be representative of the special qualities of the AONB, due to its past land use and present derelict character.
- 10.4 **Figure 2** demonstrates that the theoretical visibility of the Site is localised in relation to the surrounding landscape. This is due to the Site's low lying position in the landscape and surrounding residential land uses. Where visible, the Site is seen in the context of residential land uses adjacent to the B2011 in views from the north and east. In views from the south, the Site is not visible from PRoW along the coast due to intervening land uses. In closer proximity to the Site and in views from the west, the Site is also seen in the context of residential land uses and properties at Satmar Holiday Park. The boundary vegetation at the Site visually separates it from the rural fields in the AONB with the Site is seen in the context of a number of developments within the AONB and adjacent to the B2011.
- 10.5 From the above, the combination of the lower attributes of landscape and visual value along with the Site's ability to accommodate residential development due to its past land use, results in the Site having a lower sensitivity than the generically higher sensitivity assigned to the AONB.

### Design Mitigation

- 10.6 The LVA assesses the Proposed Development based upon the Sketch Layout Plan. This plan demonstrates that 10 dwellings can be located within the Site and retain the existing boundary vegetation via 10m buffers along the northern and western edges of the Site.

- 10.7 The Sketch Plan also demonstrates that the layout can create a strong sense of place through forming an enclosed space by the dwellings orientated away from the B2011.

### **Likely Effects**

- 10.8 At the Site level, there would be an obvious and inevitable change in character due to the new residential land uses in comparison to the existing derelict character of the Site. The Proposed Development would introduce new buildings within a Site which was in part previously developed land. The alterations to surface landform would be localised, as the Site is generally flat and has areas of existing hardstanding from the former filling station. The predicted high tiers of effect at the Site level are common place for residential development and are not specific to the Site. The pertinent matters are that there would be no loss of the key boundary vegetation, changes to landform would be limited and the new buildings present the opportunity to introduce high quality architecture within the Site. The predicted effects would also reduce in time with the establishment of the proposed planting within the Site.
- 10.9 There would be no change to the published landscape character areas. This is due to the very small scale and extent of the Proposed Development and that the design presents the opportunity to introduce high quality architecture, which would aid in raising the design standards of the area.
- 10.10 The visibility of the Proposed Development would be reduced by the retention and enhancement of the Site's boundary vegetation. The main visibility would relate to the upper parts of the facades and roofscape. This would form a greater extent of residential buildings within the composition of views in comparison to views of existing buildings adjacent to the northern side of the B2011. Where visible, the Proposed Development would result in small changes to the composition of views and would be seen in the existing developed context of this part of the AONB and residential land uses to the south of the B2011, such that the visual effects are predicted to be of lesser importance overall.

### **The Site's Allocation**

- 10.11 With reference to **Figure I**, the Site is located at the periphery of the AONB, and set between existing residential land uses and tall communication masts, such that it is not contiguous with fields across the wider AONB to the north and east of the Site.
- 10.12 As a periphery location, adjacent to the B2011, the Site is in a part of the AONB which the published landscape character assessments acknowledge has 'urban-fringe' influences. The Site is connected and related to existing built form at Capel-le-Fere as it is adjacent to residential land uses and 25m to the north-east of the settlement boundary.
- 10.13 The perception of the Site is mainly from along the B2011. When travelling east along the B2011, the perception of the Site is that it is part of the residential land uses adjacent to the B2011, prior to the junction with Winehouse Lane. It is when one passes this junction and the speed limit increases, that

one has the perception of leaving Capel-le-Ferne, with the setting provided by the fields on both sides of the B2011.

10.14 When travelling west along the B2011, it is similarly these fields on both sides of the B2011 prior to the junction with Winehouse Lane which provide the sense of setting to Capel-le-Ferne. The perception at arriving at Capel-le-Ferne is when one arrives at the junction with Winehouse Lane and the speed limit decreases. One then passes existing residential land uses on both sides of the B2011 before arriving at the Site, such that the Site is perceived as being within Capel-le-Ferne and not part of its wider setting.

### **Conclusion**

10.15 The Site is considered to be a logical location for residential development in landscape and visual terms due to its location adjacent to the B2011 and existing residential land uses.

10.16 The Proposed Development would conserve and enhance the existing vegetation around the perimeter of the Site (in accordance with draft policy requirements) and provides the opportunity to introduce high quality design and raise the design standards of the area. The Proposed Development would therefore respond positively to AONB development policies and conserve the AONB's special qualities.

10.17 The Proposed Development would not conflict with NPPF paragraph 176 as the scale and extent of the Proposed Development would be limited. The scale and extent of the Proposed Development would also reflect that of adjacent residential land uses, also within the AONB extending to the north of the B2011. Landscape and visual effects would be very localised and moderated to tiers of lesser importance.

10.18 The Site's allocation is therefore considered to be sound in respect of landscape and visual matters.

## **11.0 APPENDIX I: LVA METHODOLOGY**

11.1 The method of landscape and visual appraisal for the Proposed Development has been devised to address the specific issues raised by a development of this scale and nature. The methodology draws upon the following established best practice guidance:

- Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (Landscape Institute and Institute of Environmental Management and Assessment 2013).
- Landscape Institute Assessing Value outside of national designations (2021).
- Landscape Institute Guidance Note 06/19 2019: Visual Representation of Development Proposals.

11.2 The scope of the assessment has been determined through desktop study, fieldwork and using professional judgement. A study of the landscape components, character and views within the Site and surrounding area has been carried out. This is presented in relation to:

- Site context;
- Topography;
- Vegetation;
- Access routes - roads, railways, public rights of way and access;
- Settlement and land-use;
- Landscape character; and
- Representative views.

11.3 This is supported by tables, drawings and photographs as appropriate. This baseline study forms the basis of the assessment of the potential effects of the Proposed Development. This assessment has been undertaken by means of both desk study and a site visit, which was carried out in October 2022. The description of landscape character and views has been based on the conditions found at that time.

### **ASSESSMENT PROCESS**

11.4 This methodology identifies potential landscape character and visual receptors within the Study Area in order to establish the baseline conditions. The approach to this assessment is based on the Guidelines for Landscape and Visual Impact Assessment and is outlined below:

- The sensitivity of the receptor is derived from the value and susceptibility of the receptor.
- The potential magnitude of impact is described as High, Medium, Low, Very Low or None based criterion.



- The assessment of effects is derived through a combination of sensitivity of the receptor and the magnitude of impact associated with the Proposed Development, defined as Major, Moderate, Minor, Negligible or Neutral; and
- These effects are then described as important or not important in relation to the definitions.

### Landscape Character Assessment Methodology

#### The Nature of the Landscape Receptor (Sensitivity)

- 11.5 The sensitivity of a landscape receptor is defined via a combination of their landscape value and susceptibility.

#### Landscape Value

- 11.6 The value of the landscape receptor is based upon the consideration of any landscape designations and the criteria outlined in GLVIA 3 Box 5.1 along with consideration of LI Technical Note assessing landscape value outside of designated landscapes:

- Quality (condition).
- Scenic quality;
- Rarity;
- Representativeness;
- Conservation Interests;
- Recreation value;
- Perceptual aspects;
- Functional value; and
- Associations.

- 11.7 From the consideration of these factors, an assessment of the landscape value is based upon the criteria outlined in Table 13-1.

Table 11-1: Landscape Value Criteria

Value	Criteria
<b>Very High</b>	The receptor may be internationally designated or exhibit the most of the key features of a nationally designated landscape.
<b>High</b>	The receptor is likely to be highly valued for one or more of its attributes and may be protected by a statutory landscape designation. The landscape receptor may contain elements/features that could be described as unique; or are nationally scarce; or mature vegetation with provenance such as ancient woodland. Mature landscape features which are characteristic of and contribute to a sense of place and illustrates time-depth in a landscape and if replaceable, could not be replaced other than in the long term.

Value	Criteria
<b>Medium</b>	The receptor is likely to have a positive landscape character but could include some areas of alteration/degradation/or erosion of features;and/or perceptual/aesthetic aspects.The receptor may have some vulnerability to change;and/or features/elements that are locally commonplace; unusual locally; or mature vegetation that is in moderate/poor condition or readily replicated.The receptor is likely to be valued at a district or local level only.
<b>Low</b>	The receptor is likely to be undesignated and with little recognised value.Areas which are relatively commonplace in character with few/no notable features and/or landscape elements/features that make a contribution to local distinctiveness.
<b>Very Low</b>	The receptor is likely to be a detracting feature, damaged or eroded or is considered not to contribute positively to the landscape.

### Landscape Susceptibility

- 11.8 GLVIA 3 defines landscape susceptibility as “the ability of a defined landscape receptor to accommodate the specific Proposed Development without undue negative consequences.” (within the GLVIA 3 glossary) and also as “the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.” (GLVIA pages 88 and 89).
- 11.9 Table 13-2 sets out the criteria for landscape susceptibility.

Table 11-2: Landscape Susceptibility Criteria

Susceptibility	Criteria
<b>Very High</b>	The landscape is likely to have a very strong pattern / texture or unique and/or rare and intact and/or with a no ability to accommodate change.
<b>High</b>	The landscape is likely to have a strong pattern / texture or is a simple but very distinctive landscape and essentially intact and/or with a small ability to accommodate change.
<b>Medium</b>	The landscape is likely to have a moderate pattern / texture or is simple but distinctive and mostly intact and/or reasonably tolerant of change.
<b>Low</b>	The landscape is likely to have a weak pattern / texture and or is simple but not distinctive and may already be partially degraded with common/ indistinct features and minimal variation in the landscape pattern and/or tolerant of substantial change.
<b>Very Low</b>	The landscape is likely to have a damaged or a substantially modified pattern / texture and/or able to accommodate change.

### Landscape Sensitivity

- 11.10 Table 13-3 sets out the criteria for landscape sensitivity, resulting from the combination of the landscape value and landscape susceptibility.

Table 11-3: Landscape Sensitivity

Sensitivity	Criteria
<b>Very High</b>	A designated landscape that is highly valued and is likely to be fully representative of the designations, such that is susceptibility to very small changes only.
<b>High</b>	A valued landscape, whether through landscape designations or distinctive components and characteristics, susceptible to small changes.
<b>Medium</b>	Landscape with some value (including designated landscapes), but of relatively common components and characteristics, reasonably tolerant of changes.
<b>Low</b>	Landscape of limited value, relatively inconsequential components and characteristics, unlikely to be designated, the nature of which is potentially tolerant of substantial change.
<b>Very Low</b>	Very low or no value, a degraded landscape or landscape with very few or no natural or original features remaining and not designated, such that it is tolerant of change.

#### Landscape Nature of Effect (Magnitude of Impact)

- 11.11 The magnitude of impact is determined by considering the following aspects of the Proposed Development to derive an overall magnitude of change, as set out in Table 13-4 Landscape Impact.

Table 11-4: Landscape Magnitude of Impact

Landscape Impact	Criteria
<b>High</b>	The total or major loss or alteration of key characteristics or the addition of new features or components that would substantially alter the character or setting of the receptor. Change may be permanent or reversible.
<b>Medium</b>	The partial loss or alteration of characteristics or the addition of new features or components that would alter the character or setting of the receptor. Change may be permanent or reversible.
<b>Low</b>	The limited loss or alteration of components or the addition of new features or components that reflect the character or setting of the receptor. Change may be permanent or reversible.
<b>Very Low</b>	Virtually imperceptible loss or alteration or addition of new features or components that overall retain the character or setting of the receptor. Change may be permanent or reversible.
<b>None</b>	No change to the character or setting of the receptor. Change may be permanent or reversible.

### Visual Appraisal Methodology

#### The Nature of the Visual Receptor (Sensitivity)

- 11.12 In line with GLVIA 3, visual sensitivity is a combination of the value of the view, combined with the susceptibility of the viewer to the particular or specific change arising from the Proposed Development.

## Visual Value

11.13 Table 13-5 sets out the criteria and descriptions for visual value.

Table 13-5: Visual Value

Value	Criteria
<b>Very High</b>	A view which is recognised as 'iconic' and/or a specific visitor attraction or fully representative of a designated landscape.
<b>High</b>	A recognised high-quality view, likely to be well frequented and/or promoted as a beauty spot/visitor destination; a view with strong cultural associations (recognised in art, literature or other media); a view which relates to the experience of other features, for example heritage assets in which landscape or visual factors are a consideration; and a view which is likely to be an important part of or primary reason for the receptor being present at the location.
<b>Medium</b>	A view, whilst it may be valued locally, is not widely recognised for its quality or has low visitor numbers. The view may have cultural associations. An attractive view which is however unlikely to be the receptor's primary reason for being there.
<b>Low</b>	An ordinary, but not necessarily unattractive view, with no recognised quality which is unlikely to be visited specifically to experience the views available. Although the view may be appreciated by receptors, it is typically incidental to the receptor's reason for being there.
<b>Very Low</b>	A poor quality or degraded view which is unvalued or discordant and is unlikely to be the receptor's reason for being there. A view which detracts from the receptors experience of being there.

## Visual Susceptibility to Change

11.14 Table 13-6 outlines the relevant criteria and descriptions.

Table 13-6 Visual Susceptibility

Susceptibility	Criteria
<b>Very High</b>	Visitors to iconic view locations.
<b>High</b>	Residents at home; people engaged in outdoor recreation, whose attention/interest is likely to be focused on the landscape or particular views, including strategic/ popular public rights of way; visitors to heritage assets or other attractions, where views of the surroundings are an important contributor to the experience; communities where views contribute to the landscape setting enjoyed by residents and travellers on identified scenic routes which people take to experience or enjoy the view.
<b>Medium</b>	Travellers on road, rail, or other transport routes who anticipate some enjoyment of landscape as part of the journey but where the attention is not primarily focused on the landscape; users of Public Rights of Way or where the attention is not focused on the landscape; and schools and other institutional buildings and their outdoor areas, play areas.

Susceptibility	Criteria
<b>Low</b>	Travellers on road, rail or other transport routes not focused on the landscape/particular views e.g., on motorways and “A” road or commuter routes; and people engaged in outdoor sport/recreation which does not involve/depend upon appreciation of views of the landscape.
<b>Very Low</b>	People at their place of work whose attention may be focused on their work/activity and not their surroundings.

#### Visual Sensitivity

- 11.15 From the consideration of the visual value and visual susceptibility, the visual sensitivity of a receptor is classified as per Table 13-7:

Table 13-7 Visual Sensitivity

Sensitivity	Criteria
<b>Very High</b>	Activity specifically focused on a designated or iconic view.
<b>High</b>	Activity resulting in a particular interest or appreciation of the view (e.g. residents or people engaged in outdoor recreation whose attention is focused on the landscape) and/or a high value of existing view (e.g. a designated landscape, unspoilt countryside or conservation area designation).
<b>Medium</b>	Activity resulting in a general interest or appreciation of the view (e.g., residents or people engaged in outdoor recreation that does not focus on an appreciation of the landscape, residents) and/or a medium value of existing view (e.g., suburban residential areas or intensively farmed countryside).
<b>Low</b>	Activity where interest or appreciation of the view is secondary to the activity (e.g., people at work or motorists travelling through the area) and/or low value of existing views (e.g., featureless agricultural landscape, poor quality urban fringe).
<b>Very Low</b>	Activity where interest or appreciation of the view is inconsequential (e.g., people at work with limited views out, or drivers of vehicles in cutting) and/or very low value of existing view (e.g., Industrial areas or derelict land).

#### Visual Nature of Effect (Magnitude of Impact)

- 11.16 The following factors are considered to determine an overall visual magnitude as set out in Table 13-8.

Table 13-8 Visual Impact

Visual Impact	Criteria
<b>High</b>	Extensive change to the composition of the existing view (e.g., widespread loss of characteristic features or the widespread addition of new features within the view) and/or high degree of exposure to view (e.g., close, direct or open views).

Visual Impact	Criteria
<b>Medium</b>	Partial change to the composition of the existing view (e.g., loss of some characteristic features or the addition of new features within the view) and/or medium degree of exposure to the view (e.g. middle-distance or partially screened views).
<b>Low</b>	Subtle change to existing view (e.g., limited loss of characteristic features or the addition of new features within the view) and/or low degree of exposure to view (e.g., long-distance, substantially screened or glimpsed views).
<b>Very Low</b>	Barely perceptible change to the existing view and/or very brief exposure to view.
<b>None</b>	No change to the view.

### Classification of Landscape and Visual Effects

11.17 The overall significance of landscape and visual effects has been derived by considering the combination of the sensitivity of the receptors and the magnitude of the Proposed Development. A guide to these combinations to determine importance is set out below in Table 13-9.

11.18 Where the guide allows for a choice (e.g. major or moderate) a reasoned explanation is provided in the assessment narrative for the single effect, i.e. major.

Table 13-9 Classification Guide for the Significance of Landscape and Visual Effects

Sensitivity of Receptor	Magnitude of Impact				
	High	Medium	Low	Very Low	None
<b>Very High</b>	Major	Major	Major or Moderate	Moderate or Minor	Neutral
<b>High</b>	Major or Moderate	Major or Moderate	Moderate or Minor	Minor or Negligible	Neutral
<b>Medium</b>	Major or Moderate	Moderate or Minor	Minor or Negligible	Negligible	Neutral
<b>Low</b>	Moderate or Minor	Minor	Minor or Negligible	Negligible or Neutral	Neutral
<b>Very Low</b>	Minor or Negligible	Negligible	Negligible or Neutral	Neutral	Neutral

11.19 Major or moderate effects are important, with minor, negligible and neutral effect of lesser importance.

11.20 A description of the landscape and visual importance of effects is set out in Table 13-10.

Table 13-10 Landscape and Visual Importance of Effects

Effect	Landscape Effect	Visual Effect
Major beneficial	Where the Proposed Development substantially improves the scale, landform and pattern of the landscape and/or enriches the quality or characteristic features.	Where the Proposed Development results in a pronounced improvement to the existing view

<b>Effect</b>	<b>Landscape Effect</b>	<b>Visual Effect</b>
Moderate beneficial	Where the Proposed Development largely improves the characteristic of the scale, landform and pattern of the landscape, and/or quality or characteristic features.	Where the Proposed Development results in a notable improvement to the existing view.
Minor beneficial	Where the Proposed Development partially improves the scale, landform and pattern of the landscape, and/or quality or characteristic features	Where the Proposed Development causes a partial improvement to the existing view.
Negligible beneficial	Where the Proposed Development causes a very slight improvement to the existing landscape.	Where the Proposed Development causes a barely perceptible improvement to the existing view
Neutral	No change to the landscape character.	No change to the view.
Negligible adverse	Where the Proposed Development causes a very slight deterioration to the existing landscape.	Where the Proposed Development causes a barely perceptible deterioration to the existing view
Minor adverse	Where the Proposed Development partially deteriorates the scale, landform and pattern of the landscape, and/or quality or characteristic features.	Where the Proposed Development causes a partial deterioration to the existing view.
Moderate adverse	Where the Proposed Development largely deteriorates the characteristic of the scale, landform and pattern of the landscape, and/or quality or characteristic features.	Where the Proposed Development results in a notable deterioration to the existing view.
Major adverse	Where the Proposed Development substantially deteriorates the scale, landform and pattern of the landscape and/or quality or characteristic features.	Where the Proposed Development results in a pronounced deterioration to the aesthetic quality or composition of the existing view.

### Zone of Theoretical Visibility

- 11.21 The ZTVs prepared for the LVA and presented has been prepared using ESRI ArcMap and OS Terrain 5m.

### The Study Area

- 11.22 The Study Area has been defined as a 2km radius from the centre of the Site. This has been selected through ZTV analysis fieldwork, an analysis of topographic maps, aerial photography and investigation into the existing landscape character studies. This distance also takes into consideration the scale and nature of the Proposed Development and is considered to be proportionate. Furthermore, it is regarded those views of the Proposed Development beyond this distance would not be readily discernible to the naked eye. If distant views were achievable, the detail would be subject the influence of atmospheric conditions and would occupy such a small proportion of the field of view to be of no visual effect.

## Photography

11.23 The camera used was a high-resolution digital Cannon EOS 6D MKII. The camera and tripod were set at a height of 1.60m above the ground. These heights were chosen at the designated viewpoints to represent eye-level and gain the best possible full view, free of immediate obstructions. All photographs (unless specifically stated) are taken with a focal length equivalent to 50mm on a 30mm film camera, as this is considered to be the most accurate representation of the view as seen by the naked human eye. The time, date and camera position for each viewpoint was recorded in the British National Grid and Level Datum using GPS with an accuracy of  $\leq 3m$ . The photographs are intended to show a clear line of sight towards the Site, as well as illustrating the local context. Generally, clear weather conditions and times of day were attained, which presented legible views. All photographs were taken in accordance with the Type 1 Images within the 'Visual Representation of development proposals', Technical Guidance Note Advice Note 06/19, September 2019 by the Landscape Institute.

## Character of the Night Sky

11.24 The LVA identifies the existing character of the night sky via a review of relevant publications and night-time fieldwork. The classification of the environmental lighting zones is derived from the Institution of Lighting Professionals Table 2: Environmental Zones, as set out below.

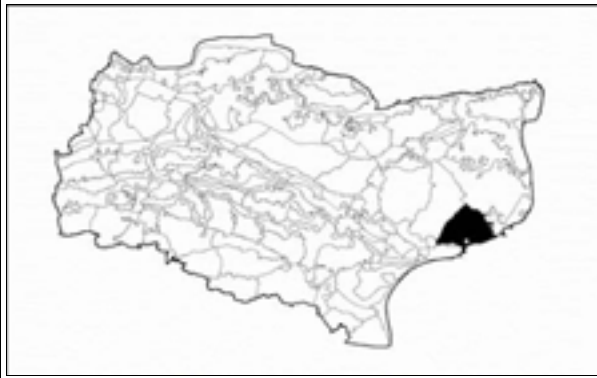
Table 13-11: Environmental Lighting Zones

Zone	Surrounding	Lighting Environmental	Examples
E0	Protected	Dark	Astronomical Observable dark skies, UNESCO starlight reserves, IDA dark sky places
E1	Natural	Dark	Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty, IDA buffer zones etc
E2	Rural	Low district brightness	Sparsely inhabited rural areas, village or relatively dark outer suburban locations.
E3	Suburban	Medium district brightness	Well inhabited rural and urban settlements, small town centres of suburban locations
E4	Urban	High district brightness	Town / City centres with high levels of night-time activity



## **12.0 APPENDIX II: EXTRACTS OF PUBLISHED STUDIES**

## ALKHAM: EAST KENT DOWNS



### ALKHAM

This area is dominated by the long ridges and isolated valleys, which feed into the Dour Valley. Near the coast, the ridges become increasingly narrower and the valleys closer. There are fewer woodlands here than in the west, and most occur on the steep valley slopes, where cultivation has been uneconomic. Many, therefore, are very old and of high nature conservation value. Few are actively managed. Much of the hedgerow network on the plateau, which was largely a 19th century creation, is being replaced by post and wire fence, so that gradually the former unenclosed landscape is being unintentionally recreated. The decaying hedges, derelict buildings and abandoned farm machinery which also occur in this are further signs of a landscape under economic stress.

The coastal downs of the Dover-Folkestone Heritage Coast form a dramatic landscape of open, cliff-top fields, exposed chalk cliffs and tumbled, scrub-covered rock-falls along the under cliff. The austerity of the cliff-top landscape is emphasised by the scarcity of trees and hedges. Only small pockets of scrub or tattered strips of remnant hedge fleck the smooth sweep of the landform. The beauty of this landscape lies in its simplicity and drama and the sense of "wilderness" which it offers.

### EAST KENT DOWNS

Alkham lies within the larger character area of the East Kent Downs.

This is a remote, peaceful area of downland, which ends in the dramatic white cliffs of Dover. Above the southern scarp, the broad back of the chalk hills is furrowed by a series of long, narrow, parallel valleys running north east. In these dry valleys, the valley bottom streams or nailbournes are underground, only flowing at the surface occasionally, during very wet winters.

The western valley systems are branching and intricate. The steep, rounded slopes are crossed by thick shaws or overgrown hedges, often swathed in the white seed-heads of wild clematis. Large arable fields on the ridge-top plateau are visually contained by long strips of deciduous, ancient woodland along the valley sides or ridge-top conifer forests, west of Elham. Towards the coast, however, the landscape becomes more exposed. There is less woodland and the strongly linear pattern of parallel ridges and valleys is more distinct.

The countryside here is criss-crossed by a maze of tiny, sunken, one-track lanes. Houses are widely scattered and many villages, traditionally built of local flint, brick and tile, are still little more than a church, a manor and a pair of farm cottages - an important characteristic of this landscape. However, this area is best known, not for its beautiful dry valleys or remote churches, but for its long association with the defence of the realm. The "White Cliffs of Dover" and the widely scattered military remains, such as pill-boxes and gun-emplacements, still exert a strong cultural influence on the landscape.

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# ALKHAM: EAST KENT DOWNS

## PHOTOGRAPH



## CHARACTERISTIC FEATURES

Long ridges and isolated valleys, formerly an ancient unenclosed landscape. Some woodland of high nature conservation value on steeper valley slopes. Coastal downs, open hill-top fields, wild with pockets of scrub.

## LANDSCAPE ANALYSIS

### Condition

The open, mainly pastoral landscape has a coherent pattern of elements but has some visual detractors in the form of recent ridge-top settlements and the motorway corridor. Woodland cover is intermittent, but there are some patches with high nature conservation interest. Open pasture is interrupted by post and wire fencing.

The condition of this area is affected by the negative impact of 20th century farmsteads, residential areas and the linear development of villages along access roads. However, the extant open hill-top fields and pockets of scrub and naturalistic vegetation restore an element of functional integrity to the area.

### Sensitivity

Indistinct remnant historic field boundaries overlie the ancient characteristics of the open, pastoral landscape. This area has intermittent tree cover and scrub which often limits views. Woodland cover in general, and much of the built form, is not of distinctive character, but the inherent pattern of open, coastal downs and isolated valleys contribute to a moderate sensitivity.

## LANDSCAPE ACTIONS

Conserve the distinctive qualities of small woodlands and open, pastoral hilltops, creating and conserving grasslands to enhance the ecological integrity of the area.  
 Conserve the isolation of undeveloped valleys and the isolated farmsteads within.  
 Create a new pattern for development of existing settlements along existing access routes in the lower valleys.  
 Create a design code for farmsteads to distinguish form and function of local farm development.

## CONTEXT

Regional: Kent Downs AONB

### Condition

good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
poor	CREATE	RESTORE & CREATE	RESTORE
	low	moderate	high

### Sensitivity

## SUMMARY OF ANALYSIS

### Condition Moderate.

Pattern of elements:	Coherent.
Detracting features:	Some.
Visual Unity:	Coherent.
Cultural integrity:	Variable.
Ecological integrity:	Moderate.
Functional Integrity:	Coherent.

### Sensitivity Moderate.

Distinctiveness:	Characteristic.
Continuity:	Historic.
Sense of Place:	Moderate.
Landform:	Apparent.
Extent of tree cover:	Intermittent.
Visibility:	Moderate.

## SUMMARY OF ACTIONS

### CONSERVE AND CREATE.

Conserve unimproved grasslands and pastures  
 Conserve and create open grassland areas  
 Conserve existing woodlands  
 Create woodland on steeper valley slopes  
 Create design code for farmsteads

[previous <<](#)

## 4.0 East Kent Downs

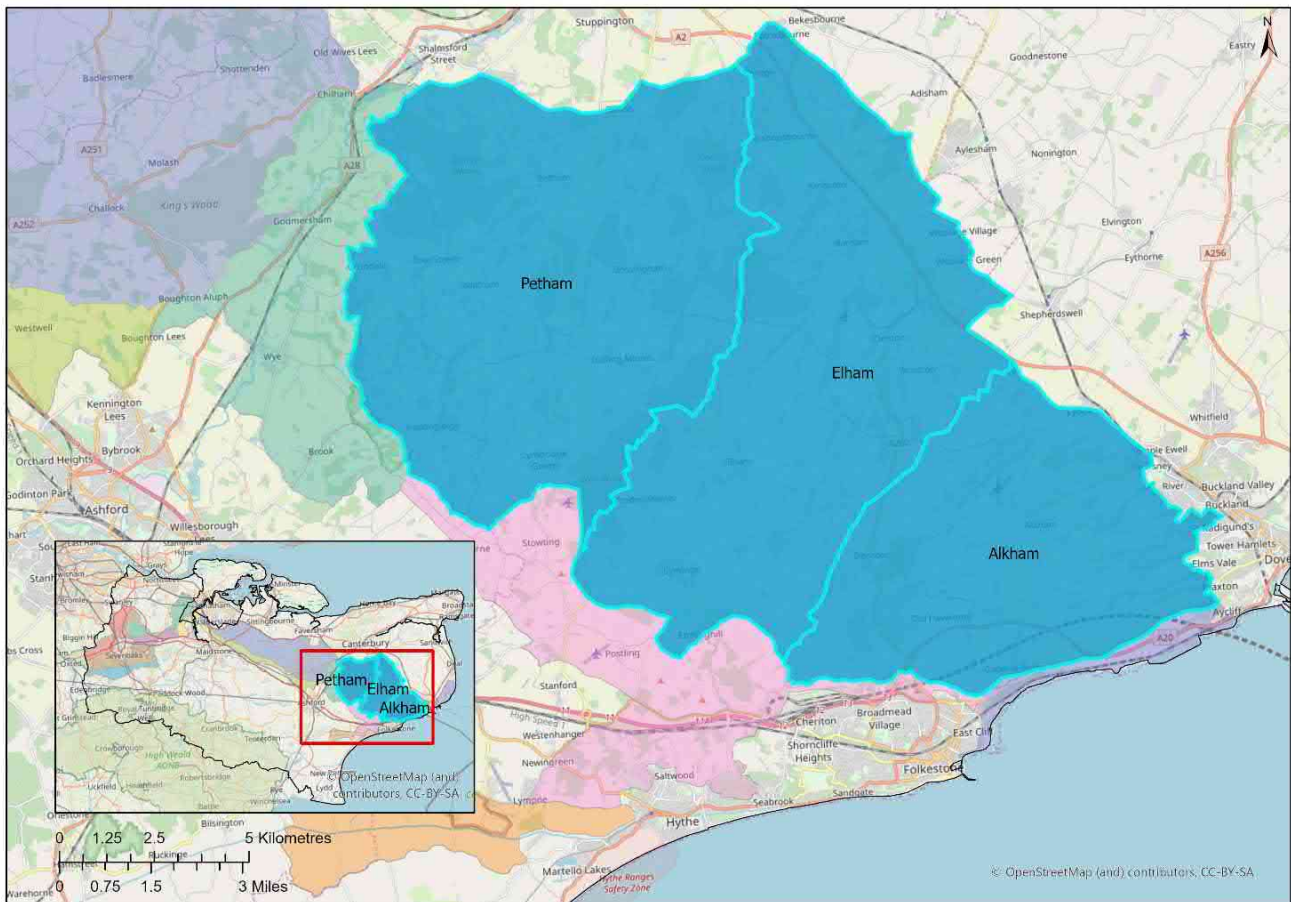
### Landscape Character Area 1C

**Landscape Character Type:** Chalk Downland

**Districts/ Boroughs:** Ashford; Canterbury; Dover; Shepway

**Landscape/Countryside Partnerships:** Kentish Stour Countryside Partnership

**Location and Context:** This large LCA is located in the east of the Kent Downs AONB, to the east of the Stour Valley LCA, and north of the Postling Scarp and Vale and the White Cliffs Coast LCAs. It includes several settlements, the largest of which are Lyminge, Hawkinge, Elham and Barham.



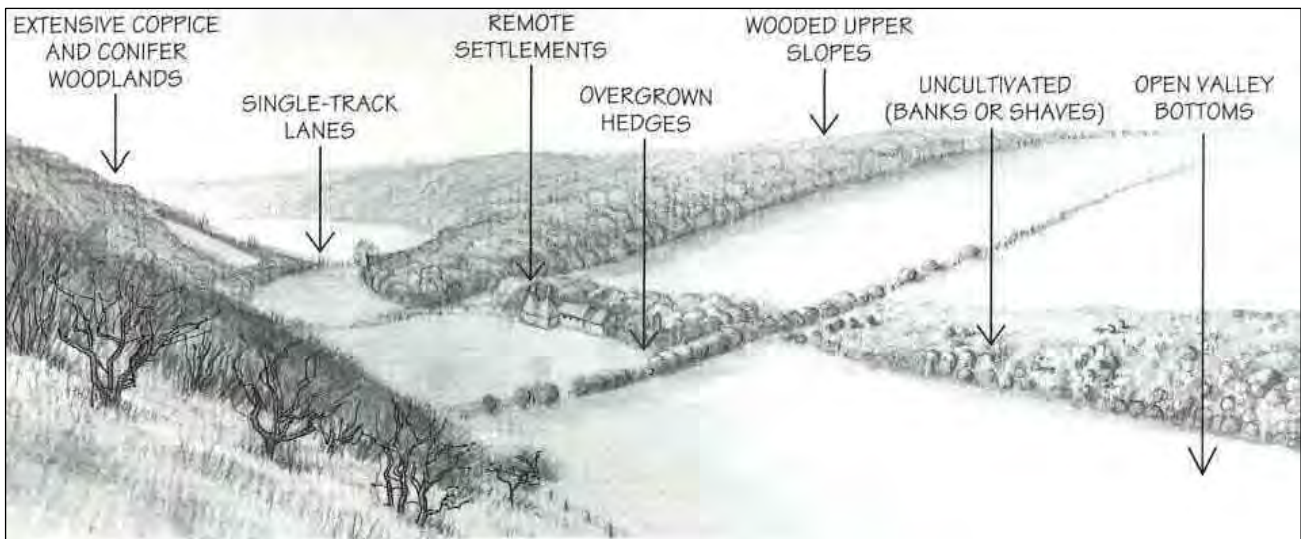
*Location map for East Kent Downs LCA, also showing Local Character Areas of Petham, Elham and Alkham*



*A typical scene in the East Kent Downs- the Nailbourne Valley looking north towards Barham*

## Summary Characteristics

- Underlying geology of Cretaceous chalk. In places the surface has weathered to create a layer of clay-with-flints, forming heavy, sticky soils.
- Rounded chalk plateau dissected by a series of parallel narrow dry valleys, becoming increasingly pronounced towards the south.
- Little surface water, but seasonal streams appearing only in winter (Nailbournes) are a distinctive feature.
- Extensive woodland blocks, particularly on ridge tops, and strips of woodland on steep valley sides. Extensive coppice and conifer woodlands. Shaves, copses and hedgerow trees throughout.
- Dominant land use is arable agriculture, but there are also areas of parkland, orchards, vines, woodland and pasture. Field patterns are variable, but are generally larger on ridges than in valleys, reflecting historic processes of enclosure.
- Semi-natural habitats include woodland, chalk grassland and parkland.
- Scattered historic buildings including churches, manors, country houses, farms and cottages.
- Relatively sparse settlement of scattered farms and occasional nucleated villages, often of brick and flint construction. Concentration of settlement in the Nail Bourne Valley, and notable common-edge settlement of Stelling Minnis.
- Dense network of historic roads and tracks, including Prehistoric routeways, Roman roads medieval drove roads and Turnpikes. Sunken single-track lanes are also characteristic.
- A relatively tranquil part of the Kent Downs AONB, with a strongly rural feel. The pattern of ridges and dry valleys gives the landscape a rhythmic feel, particularly in the south of the LCA.
- Views are often linear and channelled by landform. There are long views from high ground, overlooking adjacent valleys.



Sketch of the East Kent Downs from 'The Kent Downs Landscape' (1995)

## 4.1 Description

- 4.1.1 This is a remote, peaceful area of downland, towards the eastern end of the AONB. Its character is strongly influenced by the underlying chalk geology. Above the southern scarp, the broad back of the chalk hills is furrowed by a series of long, narrow, parallel valleys, running north-east. In these dry valleys, the valley bottom streams or *nailbournes* are underground, only flowing at the surface occasionally, during very wet winters. Water management has always been a challenge in this landscape because of the lack of surface water. Between the valleys are expansive plateaux, often covered with heavy, sticky clay-with-flint soils.
- 4.1.2 The western valley systems are branching and intricate. The steep rounded slopes are crossed by thick shaws or overgrown hedges, often seasonally swathed in the white seed-heads of wild clematis. Although much of the area has been cultivated, there are still important grassland habitats, particularly at the tops of the valley sides which are too steep to plough. Large arable fields on the ridge top plateaux are visually contained by long strips of deciduous, ancient woodland along the valley sides, or ridge-top conifer forests west of Elham. Towards the coast, however, the landscape becomes more exposed. There is less woodland and the strongly linear pattern of parallel ridges and valleys is more distinct.
- 4.1.3 The countryside of the East Kent Downs is criss-crossed by a maze of tiny, sunken one-track lanes. Many of these tracks have ancient origins, and some may have been routeways from prehistoric times. The Roman road of Stone Street (B2068) cuts through the landscape, one of several Roman Roads in the area connecting Canterbury to the coast. These ancient routes are still in use today, with many as roads, or incorporated into routes such as the Pilgrims' Way and North Downs Way. Some lanes and tracks are relics of land divisions which can date back centuries. Houses are widely scattered and many villages, traditionally built of local flint, brick and tile, are still little more than a church, a manor and farm cottages. The place name 'Minnis' refers to common land. Although most common has now been enclosed for farmland, Stelling Minnis remains the last unenclosed downland common in the Kent Downs, representing an unaltered relic of the medieval manors. .



*Plateau scene near Elmsted*

- 4.1.4 This is still a strongly rural landscape with a sense of timelessness. Much of the land is agricultural, but there are also pockets of orchards, hop gardens, an increasing number of vineyards, extensive historic parklands, and woodlands. Together they contribute to variations in its character. The larger villages have a range of origins, including the coaching village of Bridge and the railway town of Lyminge. Hawkinge is a substantial recent settlement built on open farmland which was a former Second World War grass airfield. Several villages and historic parks are designated as Conservation Areas.
- 4.1.5 The presence of the coast nearby influences the weather, with sea mist filling valleys and hovering over plateaux. Views within this Landscape Character Area are often enclosed and channelled by the linear dry valley landforms. These views contrast with the wider, panoramic views experienced from the plateaux. Dover Castle is a significant landmark to the east, and in the far south of the area, views are dominated by the presence of the sea. Although there are some localised influences from main roads and larger settlements, in general this is a peaceful landscape which feels relatively tranquil and detached from urban life. With the exception of Hawkinge, it is one of the least developed parts of the Kent Downs AONB. The area is associated with the artist Henry Moore, who lived and worked at 'Burcroft' in Kingston in the Nail Bourne Valley. He later wrote 'living at Burcroft was what probably clinched my interest in trying to make sculpture and nature enhance each other.'



*Ancient trackway over Crundale Downs*

## 4.2 Local Character Areas

4.2.1 There are three Local Character Areas within the East Kent Downs LCA. **Petham** in the west contains a network of valleys and is the least settled part of the LCA. **Elham** in the centre contains several large villages and is more strongly influenced by parkland and estate landscapes. **Alkham** in the east comprises a series of steep parallel valleys running towards the Dour, interspersed by plateaux.

### Petham

4.2.2 To the east of the Stour Valley is an intimate, sparsely populated, and remote landscape of long, rolling valleys and widely scattered farms. Blocks of deciduous woodland (including extensive areas of Ancient Woodland) crown the narrower ridges or sweep along the upper valley slopes, providing a sense of enclosure and emphasising the curving landform. There are also occasional huge uninterrupted open fields on the high plateaux between the ridges. There are frequent tantalising views into secluded coombes and extensive areas of traditional chalk grassland, such as Winchcombe Downs, supporting colonies of rare orchids and butterflies.

4.2.3 Although the hedgerow network is more fragmented and generally less diverse than around Elham, many hedges are overgrown or contain significant numbers of hedgerow trees, producing strong lines of vegetation across the otherwise smooth folds of the valleys. Where they occur, infield trees are important landscape features. Many of the valley sides have a narrow strip of woodland along their steepest slopes, where cultivation has never been possible. Known locally as *shaves*, they are often rich wildlife havens and provide a valuable contrast with the otherwise intensively farmed valley landscapes. This was once an area of widespread hop cultivation, but although redundant oast-houses dot the landscape, there are almost no hop gardens still in production. The largest settlements are generally found in the river valleys and on valley sides, but there are also several villages (often with origins associated with routeways or common-edges, such as Stelling Minnis) which are on high ground. Large farms are scattered across the plateaux as well as nestled in valleys. The distinct built form includes some minor estate houses.



*Dry Valley near Crundale, in the Petham Local Character Area*



## Elham

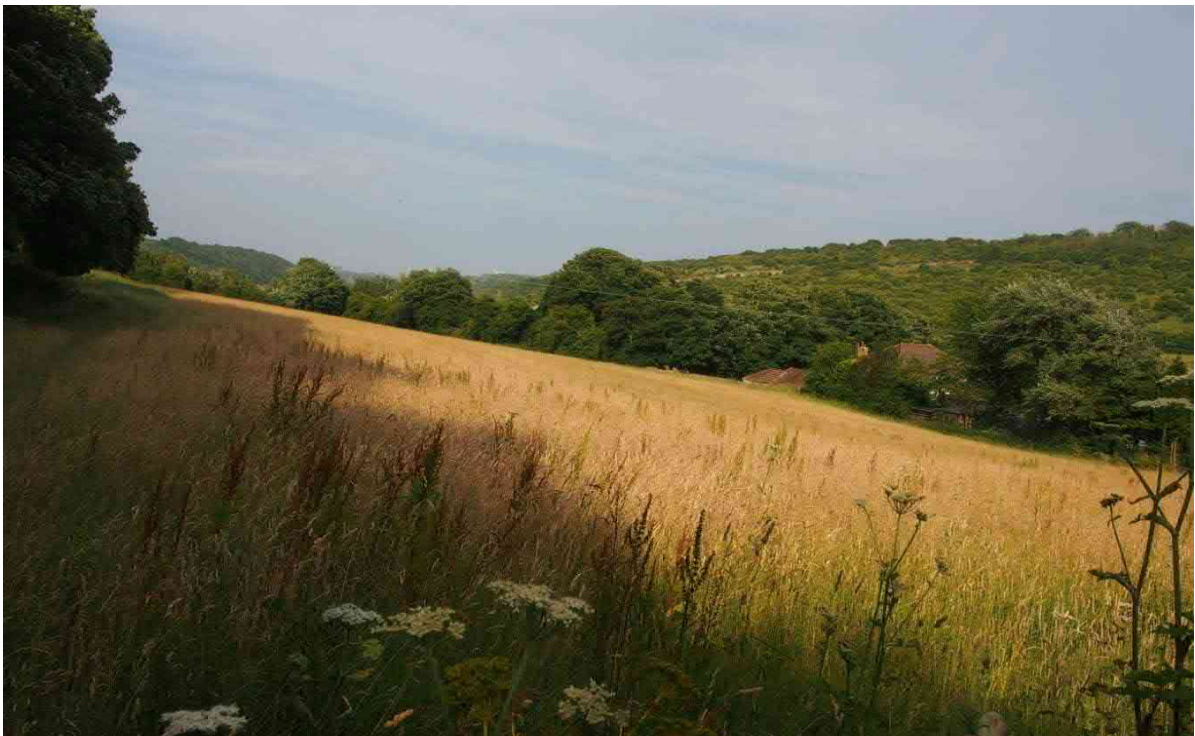
- 4.2.4 This area is a transitional landscape between the remote, enclosed countryside east of the Stour Valley and the exposed, ridges and valleys between Folkestone and Dover. It has a more settled feel, with more frequent villages, and open views from the narrow ridge-top roads. The rolling downland is the dominant visual element, and its character is also influenced by the presence of parkland and large estates. There are several Conservation Areas in the northern part of the area, comprising villages and historic parkland. The Elham Way (between Canterbury and Hythe) runs through this area.
- 4.2.5 The Elham Valley carves its way through the centre of this area, in a wide attractive sweep, up to Barham and Patricbourne. It contains a line of large villages, including Lyminge, Elham, Barham and Bridge. To the west is one of the most densely-wooded ridges of the AONB, where expanses of conifer plantations are interspersed with remnants of deciduous, ancient woodland, still concealing the ancient double banks which once formed the boundary of Elham Park. It includes more recent woodland associated with Denton Court and Wootton Park, as well as sweet chestnut coppice around Lyminge.
- 4.2.6 To the east of the Elham Valley, the landscape is predominantly large, intensively cultivated arable plateaux interspersed by dry valleys. Woodlands are fewer and much smaller, frequently on the steep valley sides. Although there has been extensive loss of hedgerows, this area still has a high proportion of hedgerow trees and botanically-rich hedges, usually near the villages. The less exposed, northern slopes around Denton are still dotted with pockets of historic parkland and orchards, and there are larger parkland estates including Acrise Park, Broome Park, Bourne Park, Bifron Park and Charlton Park. Extensive areas of grassland, parkland and woodland are managed by the Ministry of Defence. Narrow roads linking farmsteads evoke a great sense of time-depth, with settlements, estates, buildings and hedgerows also contributing a historic influence. The Norman church at Paddlesworth is the highest church in the North Downs, and is one of many isolated churches in the East Kent Downs.



*The Elham Valley near Barham, with Charlton Park in the middle of the photo*

## Alkham

- 4.2.7 This area is dominated by the long parallel ridges and sometimes isolated valleys which feed into the Dour valley. Near the coast, the ridges become increasingly narrower and the valleys closer. There are long views to Dover Castle, which are often framed by valley landforms. There are fewer woodlands here than in the west, and most occur on the steep valley slopes, where cultivation has been uneconomic. Many, therefore, are very old and of high nature conservation value, but few are actively managed. Of particular note is surviving Elm woods and hedges near Elms Vale, Dover. There are also areas of scrub on valley sides, often occurring where grassland has been left ungrazed. Much of the hedgerow network on the plateaux, which was largely a 19<sup>th</sup> Century creation, was replaced by post and wire fence in the late 20<sup>th</sup> Century, so that gradually the former unenclosed landscape was unintentionally re-created. In recent years the trend has reversed, with hedges planted on fenced and unfenced boundaries as part of landscape enhancement projects. There are extensive MoD training grounds near Lydden which tend to be cattle-grazed and include bands of conifers used in training exercises.
- 4.2.8 There are a number of surviving medieval buildings within this landscape. These include St John's chapel near Swingfield Street (associated with the Knights of St John) and the remains of St Radigund's Abbey east of Alkham, dating from 1191. There are also several medieval village churches still in use, and numerous historic houses. Steep sunken lanes and tracks wind up valley sides, connecting the dry valleys with the open downland above.
- 4.2.9 The former airfield at Hawkinge, effectively a new urban settlement, is now housing, with associated new buildings and roads visible within the landscape. The apparently undifferentiated design has little reference to its location in the Kent Downs AONB, and contrasts with the surrounding historic field patterns and ancient woodland. Management of land for equine use is a further concern in this area, particularly within the Alkham Valley.



*The Farthingloe Valley looking towards Dover Castle*



*Chestnut coppice (and chestnut pale fencing) at Pillars Wood near Paddlesworth*



*Some of the steepest land has never been cultivated and supports strips of woodland known locally as 'shaves'.*



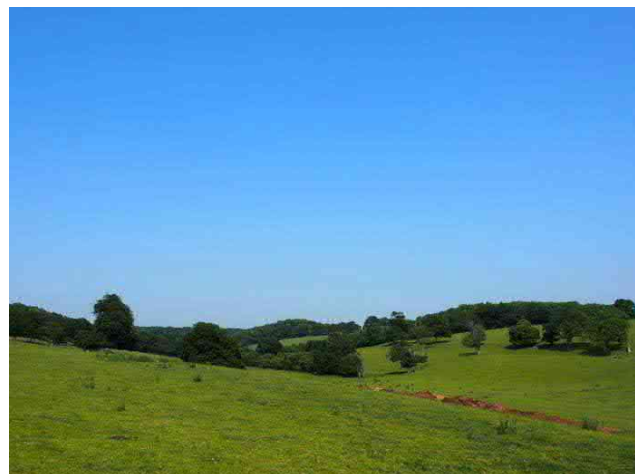
*Elham Village*



*Elmsted Church with its unusual shingled tower and ancient churchyard yew tree*



*Soft fruit-growing near Bridge*



*Acrise Park*

## 4.3 Landscape Condition, Sensitivities and Forces for Change

- 4.3.1 This is a landscape with a sense of timelessness, and for much of the area, large-scale or modern development is not apparent. The landscape appears well managed, and its condition is generally good. This area has been the focus of many habitat restoration schemes. However, the landscape is not static, and it is affected by changing practices in land management as well as development pressure. Some of the changes, such as the change in crop choice from orchards to vines, the increasing use of land for equine management, and the introduction of suburban-style gates, boundaries and road junctions are incremental, but can add up to considerable landscape change across the area.
- 4.3.2 The 1995 Assessment noted *the decaying hedges, derelict buildings and abandoned farm machinery which also occur in this area are further signs of a landscape under economic stress*. Today, although there are very occasional untidy farms, there is not a sense of abandonment or economic stress. Comparison of the 1995 and 2017 photographs below shows that there has been some loss of parkland/ hedgerow trees, and that the foreground hedgerow has grown up, but otherwise the landscape looks very similar.
- 4.3.3 The dominance of the landform within this LCA means that skylines can be particularly prominent and therefore sensitive to change. The woodlands provide some screening function, but with tree disease becoming an increasing issue such screening cannot be relied on in the long term.



View west from Elmsted, GR 114449 in 1995 (above) and 2017 (below)

<b>Issue</b>	<b>Landscape sensitivities and potential landscape impacts</b>
Changing farming practices	<p>The trend for vine growing reflects changes in the Kent climate, as well as changing fashions. The French champagne maker Tattinger has recently started planting vines in this part of Kent, so this change is likely to continue – significant parts of the LCA are thought suitable for vine growing.</p> <p>The use of polytunnels for soft fruit growing is also having an impact on the landscape in the north of this LCA, although it is not currently prevalent. The light colour and reflective nature of the plastic covers mean that they stand out within the wider landscape, especially where they cover an extensive area.</p> <p>Intensification of farming has occurred over recent decades, and can be seen in the larger farm buildings and structures, and in the large open arable fields from which hedgerows have been removed. There has also been some diversification, particularly letting of land or change of use for horse grazing. This can result in the use of high visibility fencing, heavy grazing pressure and subdivision of fields which have a locally-significant detrimental landscape impact. The new Environmental Land Management Scheme (ELMS) offers opportunities to restore and reinforce valued characteristics of the landscape.</p>
Condition of habitats	<p>Some areas of particular wildlife value, such as chalk grassland and woodland exist simply because the land is too steep or difficult to plough. They are not intentional, and therefore often may not be in active management. Growth of scrub on grassland is noticeable around the LCA, due to reduction in grazing pressure.</p> <p>Woodland is also often under-managed, although there are areas of coppice. Past decades have seen planting of extensive conifer plantations, particularly in the central part of the LCA. Some (e.g. Park Wood) are owned by the Forestry Commission and have some recreational function. The trend for ‘woodlotting’ when woodlands are broken up into multiple ownership makes co-ordinated management of woodlands much more difficult and can have direct landscape impact through subdivision of woods and the introduction of fences, sheds and hard-standing areas.</p> <p>Ash Dieback is affecting hedges, woodlands and in-field and roadside trees, and is currently particularly noticeable in the south of the LCA. There are also localised impacts from increasing deer populations.</p> <p>Intensification of agriculture over past decades has resulted in loss of hedgerows and field margins. Recent years have seen a focussed effort on improving habitats locally, including bringing contiguous areas of farmland and grassland (across multiple farm holdings) into positive management. Schemes include field margins, hedgerow restoration/ planting and some of the largest areas of wildflower-seeded arable reversion in the county. Nevertheless, there are still further opportunities for restoration of habitats and wildlife corridors.</p>
Recreation	<p>There are a small number of recreation sites such as Lydden Race Circuit, caravan sites, and golf courses, which do not currently sit comfortably within the surrounding landscape, affecting landscape quality and in the case of Lydden having significant temporal noise effects, harming the tranquillity of the landscape</p> <p>There is also some recreation pressure, particularly on popular footpaths and bridleways near larger settlements which is resulting in path erosion and dog waste. Off-road vehicles damage paths and track surfaces in some areas, particularly during the winter months.</p>

<b>Issue</b>	<b>Landscape sensitivities and potential landscape impacts</b>
<p>Management and maintenance of historic buildings, structures and designed landscapes</p>	<p>There are a small number of Listed Buildings and Scheduled Monuments ‘at risk’ within this LCA, including barrows, estate buildings, churches and St Radigund’s Abbey. The settings to historic buildings are also vulnerable to changes, particularly new development and highways measures.</p> <p>Maritime defence heritage is particularly vulnerable due to its coastal location and lack of public awareness of its existence.</p> <p>There are a number of historic parklands within this LCA, and without pro-active management, such as the planting of young parkland trees, the parklands will gradually disappear from the landscape as trees become over-mature and die or become damaged in high winds or affected by tree pests and disease. At the moment, some historic parkland is in MOD ownership, and is well managed, but should land ownership change, its future management is not guaranteed.</p>
<p>Development</p>	<p>Development which is of a scale or type that does not sit comfortably within the AONB landscape is largely confined to the peripheries of this LCA, particularly around Hawkinge and on the edge of Dover, although there have been large-scale development proposals elsewhere, such as at Bridge. Such developments risk undermining the area’s rural nature, and the distinctive character of its buildings.</p> <p>Linear expansion of valley-floor settlements up the valley sides has occurred in several villages, and is noticeable within the landscape.</p> <p>Urbanising and urban-fringe influences are most prevalent along the main roads within the area, particularly around larger settlements. These can reduce the rural character, and also introduce elements which are not designed to be locally-distinctive.</p>
<p>Highways and transport</p>	<p>The location of the proposed new Lower Thames Crossing is likely to increase traffic levels on the A2, which may in turn lead to more traffic management features and further erode its rural character. Potential widening of the A2 and pressure for lorry parks along its routes are also concerns.</p> <p>Loss of character of rural lanes and impacts on the tranquillity of the small lane and rural road network is a further concern, particularly given increased traffic levels and numbers of delivery vehicles and inappropriate highway treatments.</p> <p>This LCA is generally quite tranquil but tranquillity can be interrupted by overflying airplanes following principle designated international flight paths for Heathrow and Gatwick.</p>
<p>Water management and coastal change</p>	<p>The LCA’s underlying chalk geology means that is vulnerable to both drought and occasional flooding, when the nailbourne streams run.</p>
<p>Climate change and natural forces</p>	<p>The gradual warming of temperatures is reflected in the land use changes which are already occurring within the LCA, particularly the growing of vines. Hotter, drier summers are likely to result in drought conditions and water shortages. These may also affect the types of trees, plants and animals which can thrive. Wetter winters and more frequent storm events are likely to result in flooding.</p>



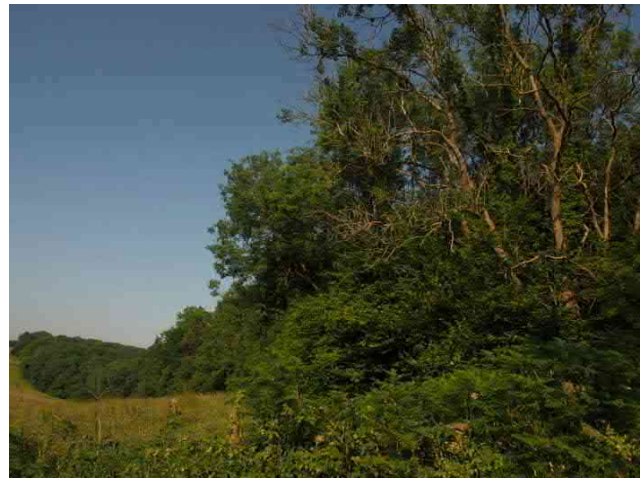
*Newly-planted vines near Barham*



*Polytunnels near Bridge*



*Scrub growth on valley side, Farthingloe Valley*



*Ash Dieback in woodland edge near Hemsted*



*New development on former airfield at Hawkinge*



*Increased traffic levels are affecting the tranquillity of rural lanes*

## 4.4 Landscape Management Recommendations

### Aspirational Landscape Strategy

The LCA retains its strongly rural character, which is conserved and enhanced. Any visual and landscape impacts from surrounding urban areas, main roads and new developments are kept to a minimum through high quality design and careful land management. Development within the LCA is at a scale and of a quality that does not detract from, and seeks to conserve and enhance, the character and qualities of the area. Local communities, Planning Authorities and other agencies work together to achieve this. Rural lanes retain their historic character and are not unduly influenced by signage, kerbs or other urbanising features.

Local farms are thriving, and where farms are diversifying (for example into or vine growing) this is being done in a way which conserves and enhances the landscape. Farmland management promotes wildlife and landscape enhancements through the provision and linking of habitats, and the positive management of landscape features. Woodland, forestry and grassland areas are in active sustainable management, and are interconnected.

The area's rich heritage is celebrated and looked after, and local people are aware of the history and importance of their local landscape.

#### Protect

- Protect historic/ archaeological sites and their settings, particularly those identified as 'at risk'.
- Protect non-designated historic landscape features such as lanes and field patterns, particularly where they are threatened with highways works or other development.
- Protect the small scale, isolated pattern and rural character of settlements within this LCA. Avoid ribbon development along roads and large scale development.
- Protect the isolated nature of farmsteads.
- Protect skylines and consider the impacts of new developments (including communications masts) on open skylines.
- Protect trees and woodlands, particularly where they have a screening function.
- Protect open views and long views along valleys, avoiding the introduction of new developed elements into these views.
- Protect tranquillity, resisting developments which increase levels of noise and movement in the landscape, and maintain the remote, undeveloped qualities of the valleys.

#### Manage

- Manage tree and woodland cover, promoting a characteristic and resilient species mix (using The Ash Project species recovery mixes) and hazel and chestnut coppice where appropriate. Replace dead ash trees with alternative species as necessary, and increase the proportion of deciduous woodlands. Promote deciduous planting at the edges of plantations. Extend woodland edges and create shaws to define arable fields and pastures.
- Manage hedgerows and shaws and try to link them with woodlands to enhance the habitat network. Reinststate hedgerows lost through intensive agricultural practices. Manage in-field trees and replace and replant to increase their number across the LCA. Promote in-field and roadside trees using existing hedge stock.
- Enhance ecological connectivity in arable areas, for example through provision of field margin strips and re-connecting hedgerows.



- Manage common land around Stelling Minnis to improve biodiversity and retain distinctive character. Use considered reintroduction of grazing if feasible.
- Conserve treed avenues alongside roads where they are a feature of the landscape.
- Conserve and enhance chalk grasslands, particularly where invasive scrub is taking hold, through appropriate grazing, and connecting and expanding them where possible. Consider reversion of arable land to grassland.
- Continue to promote best practice with regard to equine management, work with Local Authorities to require and condition best practice, where planning permission is granted for a change of use from agricultural to equine management
- Manage public rights of way, ensuring that popular routes are robust enough to cope with the level of use. Provide new paths where required (e.g. dog-walking circuits near new developments) and work with landowners to address issues of illegal off-road vehicles and to minimise conflicts between off-road vehicles and legitimate users.
- Manage the impact of highways and highway schemes through the use of the Rural streets and lanes design guidance.

#### Plan

- Promote high design standards for rural developments to ensure that they make a positive contribution to landscape character, for example through careful choice of materials, and an appropriate scale and massing of building. Seek the sympathetic use of local materials – brick, tile and flint.
- Ensure that high quality design of settlement edges is integrated into any plans for development within the LCA or on its periphery.
- Promote landscape enhancements and the mitigation of effects in and around recreational facilities (e.g. golf courses, caravan sites and Lydden motor circuit) to aid their integration into the landscape.
- Provide guidance on best-practice for planting vines with regard to the local landscape. This could include (for example) considering the alignment of vines, working within (or restoring) the surrounding hedgerow network, avoiding vines being seen against the horizon from key viewpoints, and the introduction of wildlife friendly habitats.
- Work with local communities to raise awareness of the landscape's value.
- Work with Highways Authorities to minimise the visual and landscape impacts of gantries, signage and other highways measures and ensure the application of the Kent Downs AONB Rural Streets and Lanes Design guidance.
- Work with Highways Authorities to increase the biodiversity value of verges and hedgerows without compromising safety.
- Develop guidance to ensure that impacts on views from the LCA are taken into account when considering development in the vicinity of the AONB.
- Encourage partnership working between different Local Authorities, agencies and community groups to enable seamless working across the AONB. Consider environmental/ landscape limits in planning and plan making.
- Within the setting of the LCA, work with Local Planning Authorities and designers to achieve the best possible landscape and ecological integration and minimal impact on views, with compensation achieved for lost qualities.
- Use the existing and valued landscape characteristics and qualities to design new tree establishment as part of climate change mitigation.

## **13.0 APPENDIX III: RELEVANT POLICY**

### **The National Planning Policy Framework (2023)**

#### **13.1 Paragraph 8(c) states:**

*“an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

#### **13.2 Paragraph 92 states:**

*“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

*a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*

*c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

#### **13.3 Paragraph 124 states:**

*“Planning policies and decisions should support development that makes efficient use of land, taking into account:*

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed, attractive and healthy places.”*

13.4 Paragraph 125 states:

*“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

*b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*

*c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*

13.5 Paragraph 126 states:

*“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*

13.6 Paragraph 130 states:

*“Planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>49</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

13.7 Paragraph 131 states:

*“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined<sup>50</sup>, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.”*

13.8 Paragraph 132 states:

*“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

13.9 Paragraph 134 states:

*“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:*

*a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*

*b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*

13.10 Paragraph 175 states:

*“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”*

13.11 Paragraph 176 states:

*“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”*

13.12 Paragraph 177 states:

*“When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development 60 other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

*(a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

*(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*

*(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

## **DOVER DISTRICT COUNCIL**

### **Dover District Local Plan**

13.13 Strategic Policy 1 Planning for Climate Change states:

*“The Council will seek to ensure that all new built development contributes to the mitigation of, and adaptation to, climate change through:*

*Mitigation*

*a Including low carbon design approaches to reduce energy consumption in buildings;*

*b Utilising sustainable construction techniques and optimising resource efficiency;*

*c Incorporating renewable and low carbon technologies;*

*d Providing opportunities for decentralised energy and heating;*

*e Maximising green infrastructure; and*

*f Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.*

#### *Adaptation*

*g Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing the potential for increased greenhouse gas emissions in doing so;*

*h Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production; i Improving water efficiency; and*

*j Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.*

*Applications for qualifying new built development must be supported by a climate change statement.”*

#### 13.14 SP2: Planning for Healthy and Inclusive Communities states:

*“The Council will support the creation of healthy, inclusive and safe communities in the District by:*

*1 Ensuring that new development is well served by services and facilities (for example education, health care, community, cultural facilities, play, youth, recreation, sports, faith and emergency facilities) and that a mix of uses are provided in new development that support daily life.*

*2 Creating opportunities for better active travel, to promote physical health, including provision for safe cycle and pedestrian routes.*

*3 Protecting against the loss of existing community facilities, allowing for the expansion or enhancement of existing community facilities, promoting the dual use and co-location of services in accessible places and requiring new developments to provide for the needs of their new communities.*

*4 Ensuring that new developments are designed to be safe and accessible, to minimise the threat of crime and improve public safety.*

*5 Promoting social interaction and inclusion in new developments through the provision of high quality people focussed spaces that are convenient and welcoming with no barriers to access, and that can be used by all.*

*6 Supporting the delivery of cultural infrastructure and public art projects to create a sense of place and identity in both new and existing communities.*

*7 Ensuring that all new development achieves a high standard of design both internally and externally, and that developments are designed to be resilient to climate change.*

*8 Seeking to improve the District's air quality, reducing public exposure to poor air quality and minimising inequalities in levels of exposure to air pollution.*

*9 Ensuring improved access to and quality of greenspaces, the provision of new green infrastructure, and spaces for play, recreation and sports."*

### 13.15 SP3: Housing Growth states:

*"Provision is made for at least 10,998 net additional homes, in the District over the Plan period. In order to achieve this target, additional housing sites are proposed to provide choice and competition in the market up to 2040.*

*The housing target will be met through a combination of committed schemes, site allocations and suitable windfall proposals.*

*The majority of new housing development will be in Dover Town and at Whitfield. Land is therefore identified to deliver a minimum of 3,381 4 homes in addition to existing commitments.*

*Development will then be focused in the District Centre of Deal, and the Rural Service Centres of Sandwich and Aylesham. Development in Deal, Sandwich and Aylesham will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. Land is therefore allocated to deliver in the region of 1,099 homes, in addition to existing commitments.*

*Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. Land is therefore allocated to deliver in the region of 1,112 homes, in addition to existing commitments. Development that would result in disproportionate growth to any of the District's settlements, which cannot be supported by the necessary infrastructure and services or would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted.*

*Windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and is consistent with other policies of this Local Plan. Provision is made for 14 Gypsy and Traveller pitches in the District over the Plan period. This need will be met through the intensification of existing sites and windfall proposals.*

*The Council will resist any net loss in the District's stock of dwellings, or authorised permanent Gypsy and Traveller sites; unless in accordance with other plan policies. Areas and sites that are key to the delivery of the housing growth strategy have been designated or allocated on the Policies Map."*

**13.16 SP4: Residential Windfall Development states:**

*“a. It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that serve it, taking account of the cumulative impact of any allocated sites and committed development;*

*b It is compatible with the layout, density, fabric and appearance of the existing settlement and individually or cumulatively, would not result in the coalescence or merging of two(or more) separate settlements, or the significant erosion of a gap between settlements, so as to result in the loss of individual settlement identity or character;*

*c In the case of settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, that the proposal complies in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty, and, where this is demonstrated, that the scale and extent of development is limited, sensitively located and designed to avoid or minimise adverse impacts on these designated landscapes;*

*d It would conserve and enhance landscape character and biodiversity and not result in an unacceptable intrusion into the open countryside or the loss of, important green spaces within the confines that contribute positively to the existing character of that settlement;*

*e It would preserve or enhance any heritage assets within its setting;*

*f It would not result in the significant loss of best and most versatile agricultural land currently used for agriculture;*

*g Where the site adjoins open countryside, an appropriately designed landscape buffer is included;*

*h It would not have an adverse impact on the living conditions of existing adjoining residents;*

*i Where development would result in the loss of active employment, open space, sport or community facilities within the settlement that such development is consistent with the requirements of policies EN2, PM5 and PM6 of this Plan;*

*j Traffic movements generated from the development do not result in severe impacts to the highway network that cannot be mitigated. This should be considered through transport assessments carried out in accordance with Policy TI2 which must take account of the cumulative impact of sites allocated for development. Proposals must not prejudice the ability of sites allocated for development to come forward due to limited highway capacity; and k It would be in accordance with all other relevant policies in the Plan.*

*3. New dwellings (both isolated and non-isolated) elsewhere in the countryside outside of settlement boundaries will only be permitted in exceptional circumstances under one or more of the criteria*

*i) to v), and subject to meeting criteria*



a) to k) above:

i) *there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*

ii) *the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*

iii) *the development would re-use redundant or disused buildings and enhance its immediate setting;*

iv) *the development would involve the subdivision of an existing residential building;*  
*or*

v) *the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area."*

#### 13.17 Strategic Policy SPI4 Green Infrastructure states:

*"a. Measures that conserve and enhance the green infrastructure and biodiversity of the District through the management, restoration and creation of habitats in line with the targets set out in the Local Nature Recovery Strategy, the Kent Biodiversity Strategy for the Biodiversity Opportunity Areas(BOAs) in the District and in the Dover District Green Infrastructure Strategy will be supported.*

*b Every development (excluding householder) will be required to connect to and improve the wider ecological networks in which it is located, providing on-site green infrastructure that connects to off-site networks. Proposals must safeguard features of nature conservation interest, and retain, conserve and enhance habitats, including internationally, nationally and locally designated sites, irreplaceable and priority habitats, networks of ecological interest, ancient woodland, chalk grasslands, water features, hedgerows, beaches, wetland pastures and foreshores, as green and blue corridors and stepping-stones for wildlife.*

*c Development should ensure that the integrity of the existing network of green infrastructure, including the hierarchy of designated sites, the Local Nature Recovery Network and Biodiversity Opportunity Areas across the District is strengthened as part of proposals, in order to increase the contribution to health and wellbeing, carbon sequestration and resilience to climate change delivered by such green infrastructure.*

*d All development must avoid a net loss of biodiversity and will be required to achieve a net gain in biodiversity above the ecological baseline in line with Policy NE1."*

#### 13.18 Strategic Policy 15 Protecting the District's Historic Environment states:

*"The heritage assets of the District are an irreplaceable resource and all applications that will affect a heritage asset should therefore ensure that the asset, including its setting, are conserved and enhanced in a manner appropriate to their significance.*

*The Council will work with applicants and partners to ensure that the heritage of the District can positively contribute to the character, environment and economy of the District and the quality of life of existing and future generations of residents and visitors.”*

**13.19 CCI: Reducing Carbon Emissions states:**

*“In the event that the Future Homes Standard is required to be delivered through the planning system, all new residential dwellings must achieve, as a minimum, a reduction in carbon as required by this Standard. This should be achieved using the measures set out below:*

*a An increase in fabric standards to deliver a 'fabric first' approach to new development; and*

*b The use of on-site renewable and low carbon energy technologies.*

*Until the introduction of the Future Building Standard, all new non-residential buildings must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum energy efficiencies under the energy credits.*

*Development proposals subject to this policy must submit an Energy Statement in the case of residential applications and a BREEAM pre-assessment for commercial developments as part of a planning application to demonstrate how the policy requirements above have been complied with. Policy requirements will be secured by condition.”*

**13.20 Policy CC2 Sustainable Design and Construction states:**

*“In order to mitigate against and adapt to the effects of climate change all new buildings should:*

*a Utilise layout, orientation, massing and landscaping to make the best use of solar energy, passive heating and cooling, natural light and natural ventilation;*

*b Prioritise the use of low embodied carbon and energy efficient building materials and construction techniques;*

*c Consider the lifecycle of the building and any associated public spaces, including how they can be easily modified to meet changing social and economic needs and how materials can be recycled at the end of their lifetime;*

*d Provide measures to adapt to climate change, including the provision of water efficiency measures in accordance with Policy CC4, green infrastructure in accordance with Policies CC8, PM1 and PM3 and Strategic Policies SP2 and SP14, sustainable drainage systems (SuDS) in accordance with Policy CC6, suitable shading of gardens and other open spaces, rainwater harvesting, drought resistant landscaping; and in the case of major developments, the shading of pedestrian routes and the provision of opportunities for growing food.*

*e Minimise waste and promote recycling, during both construction and occupation. All applications for new buildings should be accompanied by a Sustainable Design*

*and Construction Statement demonstrating how the requirements of this Policy have been met.”*

**13.21 CC3: Renewable and Low Carbon Energy Development states:**

*“Development to generate energy from renewable and low carbon sources will be supported where it is demonstrated that:*

*a The environmental, social and economic benefits of their proposals are made clear;*

*b It will not result in significant harm to the surrounding area, landscape character, natural or heritage assets, habitats, biodiversity, or wildlife (particularly protected species), having special regard to the natural beauty of the Kent Downs AONB;*

*c There is no significant loss of amenity to local residents by virtue of visual impact, noise, disturbance or odour;*

*d The proposals will conserve and enhance the natural environment through measures such as improvements to biodiversity;*

*e There is no loss of the best and most versatile agricultural land, unless that it can be demonstrated that no alternative lower grade land is available;*

*f It will not result in an unacceptable impact on the local transport network that cannot be satisfactorily mitigated;*

*g Any fuel required is sustainably sourced.*

*All applications for renewable and low carbon energy developments should include a supporting statement setting out how the proposals meet the criteria of this policy.”*

**13.22 CC8 Tree Planting and Protection states:**

*“Tree Planting*

*a minimum of two new trees will be required to be planted for each new dwelling (this does not apply to applications for conversions and changes of use to residential), and a minimum of one new tree will be required to be planted for every 500sqm of new commercial floorspace created.*

*b Trees should be native Kent species, of local provenance from a bio-secure source, and should be standard size in specification as a minimum.*

*c A presumption that the trees will be planted on-site rather than off-site will apply. For major development where it is demonstrated that new trees cannot be provided on-site, a financial contribution will be required towards the planting of trees off-site in accordance with the requirements of the Council's Green Infrastructure Strategy.*

*d A detailed landscaping scheme and landscape management plan should be submitted for all major development schemes, including, but not limited to, details*

*of the trees and shrubs to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development.*

#### *Tree Protection and Replacement*

*e Dover District Council will make Tree Preservation Orders (TPOs) when necessary in order to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity.*

*f Development involving the loss of or damage to a tree, group of trees or areas of woodland that are designated as being of significant amenity, biodiversity or historic value in the Council's Green Infrastructure Strategy will only be permitted when the benefits of the development clearly outweigh the benefits of their retention and the applicant has demonstrated that no alternatives are available.*

*g Trees protected by Tree Preservation Orders should be retained wherever possible, unless: i it is demonstrated by an arboriculturist report that they are dead, dying, diseased or represent a hazard to public safety; or*

*i The Council deems the felling to be acceptable with regards to the Council's policy on tree management; or*

*i The benefit of the proposed development outweighs the benefit of their retention.*

*h If felling is deemed acceptable by parts (f) or (g) then the planting of two replacement trees for each tree felled in an appropriate location will be required."*

### 13.23 PMI Achieving High Quality Design, Place Making and the provision of Design Codes states:

*"All development in the District must achieve a high quality of design, that promotes sustainability, and fosters a positive sense of place, by responding to the following principles in an integrated and coherent way. Development which is not well-designed will not be supported. Where relevant and appropriate, new development must: I*

#### *Context and Identity*

*a Demonstrate an understanding and awareness of the context of the area (including historical character), appreciate existing built form and respond positively to it.*

*b Be well designed paying particular attention to scale, massing, rhythm, layout, and use of materials appropriate to the locality.*

*c Be compatible with neighbouring buildings and spaces (including public and private spaces, green and urban spaces, spaces between and around buildings - taking into account purpose and function, access and linkages, uses and activities; comfort, image and sociability).*

*d Respect and enhance character to create locally distinctive design or create character where none exists.*

*e Have a positive and coherent identity that everyone can identify with and be visually attractive.*

*f Demonstrate the appropriateness of the proposed design response. Appropriate design responses can range from repeating or reinterpreting local building patterns through to abstract forms which blend in with the prevailing streetscape/landscape. Where relevant, developments should draw inspiration from traditional building forms to inform contemporary designs and materials.*

*g Take an integrated approach to the design process, from the project inception, where place making and sustainable development are considered as one.*

## *2 Built Form*

*a Make efficient use of land and promote compact forms of development that are walkable, and have access to local public transport, facilities and services.*

*b Be of an appropriate density (typically between 30 - 50 net dwellings per hectare) that combines the efficient use of land with high quality design that respects character and context. Higher density development will be encouraged in sustainable and accessible locations, such as around transport hubs or town centres, where this is appropriate. Lower density development may be appropriate in edge of settlement locations*

*c Incorporate focal points and destinations to create a sense of place and make it easy for anyone to find their way around.*

*d Make a positive contribution to the visual character of the area, with the aim of creating a sense of harmony and visual continuity between the existing area and proposed development.*

*e Be inclusive in its design for all users.*

## *3 Movement*

*a Integrate into existing areas of the District, be well connected with all transport modes, and prioritise sustainable transport choices.*

*c. Create a clear structure and hierarchy of streets to ensure the development is easy to understand and navigate for all groups in society.*

*c Be designed to give priority to people over cars, and reduce vehicle domination and vehicle speeds.*

## *4 Nature*

*a Demonstrate an understanding of the local landscape context and bring green and blue infrastructure into streets, open and public spaces.*

*b Ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in the development in line with Policy CC8.*

*c Provide high quality multi-functional green open spaces with a variety of landscapes and activities, including play, that also deliver enhanced biodiversity and flood mitigation.*

*d Ensure that open spaces are designed to be resilient to climate change and adaptable over time so that they remain fit for purpose and are managed and maintained for continual use.*

*e Support habitat conservation and creation for wildlife, for example through the creation of wildlife corridors, hedgehog highways, provision of swift boxes, bat roosts and bee bricks.*

*5 Public Spaces a Deliver well located, high quality and attractive public spaces that are integrated into the surrounding area, support*

*a wide variety of activities, and encourage social interaction, to promote health, well-being, social and civic inclusion.*

*b Ensure that public spaces are faced by buildings, and are designed to be safe, secure, inclusive and attractive for all to use.*

*c Incorporate trees and other planting within public spaces to promote health and well-being and provide shading.*

*d Ensure that existing features, including trees, natural habitats, boundary treatments and historic street furniture, that positively contribute to the quality and character of an area, are retained, enhanced and protected.*

*e Take a coordinated approach to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.*

*f Ensure that new advertisements do not detract from the character and appearance of the surrounding area and do not have an adverse effect on public safety.*

## *6 Homes and Buildings*

*a Ensure that the siting, layout and design of vehicle and cycle parking(including detached garage blocks) is sensitively integrated into the development so as not to dominate the landscape, maintains an attractive and coherent street scene, does not prejudice the wider functionality of public and private space, and creates an effective functional link and relationship with the buildings and areas they serve. To achieve this a range of parking solutions are likely to be required to avoid the dominance of frontage parking.*

*b Ensure a tenure-blind approach to housing development to ensure that new developments contribute to the creation of mixed and inclusive communities.*

*c Make appropriate provision for service areas, refuse storage (including waste and recycling bins), and collection areas in accordance with the nature of the development. Such areas and access to them should be appropriately sited and designed to ensure they can:*

*i Perform their role effectively without prejudicing or being prejudiced by other functions and users;*

*ii Maintain an attractive and coherent street scene and protect visual amenity; and*

*iii Avoid creating risk to human health or an environmental nuisance.*

*d. Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. This should include ensuring that there is appropriate consideration for residents to be able to segregate their waste to allow for recycling opportunities, including those who live in apartments.*

#### **7 Lifespan**

*a Be designed to add to the overall quality of the area, not just for the short term but over the lifetime of the development.*

*b Be designed and planned to last and be well managed and maintained through long term stewardship models.*

*c Be adaptable to their users' changing needs and evolving technologies, including enabling opportunities for home-working.*

*d Be robust, easy to use and look after, and enable their users to establish a sense of ownership.*

*To support the delivery of high quality buildings and places the Council will produce a District wide Design Code and locally specific Design Codes for areas in the District where significant development is proposed.*

*Development proposals must provide evidence, through their design and access statements, to demonstrate how they have responded positively to the design policies in the Local Plan guidance, including national and local design guidance, local Design Codes and the National Model Design Code, relevant Neighbourhood Plans, Village Design Statements, Conservation Area Appraisals, site specific development briefs, the Kent Design Guide, Secured by Design Guidance and where appropriate the Kent Downs AONB Landscape Design Handbook. Where significant design implications are identified on major proposals these will be referred to a Design Review Panel..”*

#### **13.24 NE2 Landscape Character and the Kent Downs AONB states:**

*“Proposals should demonstrate particular regard to the Landscape Character Area, as defined by the Dover District Landscape Character Assessment 2020 and the Kent Downs AONB Landscape Character Assessment Review, in which they are located and in particular to the following landscape characteristics:*

*a Landform, topography, geology and natural patterns of drainage;*

*b The pattern and composition of trees and woodlands;*

*c The type and composition of wildlife habitats;*

*d The pattern and composition of field boundaries;*

*e The pattern and distribution of settlements, roads and footpaths;*

*f The presence and pattern of historic landscape features;*

*g The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features.*

*In addition, all proposals within the Kent Downs AONB, including the Heritage Coasts, must have regard to the purpose of conserving and enhancing the natural beauty of the Kent Downs AONB. All proposals within, or affecting the setting of, the AONB will be supported where:*

*h Development is sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting; i The location, form, scale, materials and design would conserve and where appropriate enhance or restore the special character of the landscape;*

*j The development would enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts; and*

*k The development has had regard to the AONB Management Plan and any associated guidance.*

*Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest.”*

## **Dover Core Strategy**

### **13.25 Core Policy CP4 Housing Quality, Mix, Density and Design states:**

*“Housing allocations in the Site Allocations Document and planning applications for residential development for 10 or more dwellings should identify the purpose of the development in terms of creating, reinforcing or restoring the local housing market in which they are located and develop an appropriate housing mix and design taking account of the guidance in the Strategic Housing Market Assessment and the need to create landmark, foreground and background buildings, vistas and focal points. Density will be determined through this design process at the maximum level consistent with the design. Density should wherever possible exceed 40 dwellings net per hectare and will seldom be justified at less than 30 dwellings net per hectare.”*

### **13.26 Core Strategy Policy CP7 Green Infrastructure network states:**

*“The integrity of the existing network of green infrastructure will be protected and enhanced through the lifetime of the Core Strategy. Planning permission for development that would harm the network will only be granted if it can incorporate measures that avoid the harm arising or sufficiently mitigate its effects. Proposals that would introduce additional pressure on the existing and proposed Green Infrastructure Network will only be permitted if they incorporate quantitative and qualitative measures, as appropriate, sufficient to address that pressure. In addition, the Council will work with its partners to*



*develop the Green Infrastructure Framework and implement proposed network improvements.”*

**13.27 DM15 Protection of the Countryside states:**

*“Development which would result in the loss of, or adversely affect the character or appearance, of the countryside will only be permitted if it is: i. In accordance with allocations made in Development Plan Documents, or ii. justified by the needs of agriculture; or iii. justified by a need to sustain the rural economy or a rural community; iv. it cannot be accommodated elsewhere; and v. it does not result in the loss of ecological habitats. Provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character.”*

**13.28 DM16 Landscape Character states:**

*“Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:*

*i. It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*

*ii. It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.”*

**13.29 DM25 Open Space states:**

*“Proposals for development that would result in the loss of open space will not be permitted unless:*

*i. there is no identified qualitative or quantitative deficiency in public open space in terms of outdoor sports sites, children's play space or informal open space; or*

*ii. where there is such a deficiency the site is incapable of contributing to making it good; or*

*iii. where there is such a deficiency the site is capable of contributing to making it good, a replacement area with at least the same qualities and equivalent community benefit, including ease of access, can be made available; or*

*iv. in the case of a school site the development is for educational purposes; or*

*v. in the case of small-scale development it is ancillary to the enjoyment of the open space; and*

*vi. in all cases except point 2, the site has no overriding visual amenity interest, environmental role, cultural importance or nature conservation value.”*

## **Dover Land Allocations Plan**

### **13.30 Policy LA21: Land to the South of Sandwich Road, Ash states:**

*“The site is allocated for residential development with an estimated capacity of 95 dwellings. Planning permission will be permitted provided that:*

- i. any application for development is preceded by, and is consistent with a development brief for the whole of the site which has been agreed by the Council;*
- ii. there is a comprehensive approach to development of the whole site but if the site is developed incrementally, each phase must demonstrate that it will not prejudice the implementation of the whole development;*
- iii. the impact of development on the setting of the village and wider landscape is minimised through the siting, massing and scale of new buildings;*
- iv. the existing boundary hedgerows and vegetation are retained and enhanced as part of the development; v. vehicular access is located from Sandwich Road with an emergency access from New Street;*
- vi. there is no vehicular access from the development on Cherry Garden Lane;*
- vii. development should provide a connection to the sewerage system at the nearest point of adequate capacity and ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes; and*
- viii. a mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar and SPA sites and Sandwich Bay SAC site is developed. The strategy should consider a range of measures and initiatives.”*

## **Ash Neighbourhood Development Plan**

### **13.31 Policy ANPI: Development in the countryside states:**

*“Development proposals should comply with all relevant Policies in this Plan.*

*1.1 Development in the countryside beyond the Ash village settlement boundary will only be supported where it provides for a local business or community need on a site that is adjacent to or beyond the existing village settlement area and is physically well related to the existing settlement boundaries. The use of previously developed land and sites that are physically well connected to the existing village settlement will be encouraged where suitable opportunities exist.*

*1.2 Development proposals must have regard to the purpose of conserving and improving the physical surroundings and the natural beauty by enhancing and expanding the trees and hedgerows, preferably native/indigenous, and landscape within the designated area.*

*1.3 Developments should respect the natural environment within the designated site and adjacent land by enhancing and re-connecting the existing natural features such as veteran trees, hedges, protecting wildlife corridors/ watercourses.*

*1.4 Developments would maintain the distinctive views and visual connectivity of the village with the surrounding countryside from public vantage points within, and adjacent to, the built-up area, in particular those defined on Map 6 (Key views in and around the village of Ash).*

*1.5 In areas where there would be significant effect on Public Rights of Way, the network must also be included in the landscape planning of the infra-structure as a whole.*

*1.6 Developments should demonstrate how they will positively accommodate, divert or enhance paths and link networks.*

*1.7 Lighting should only be directed where necessary and there should be no loss of night-time dark skies due to light pollution.”*

**13.32 Policy ANP2: Designated local green spaces states:**

*“2.1 Development proposals that result in the loss of local green spaces or result in any harm to their character, setting, accessibility, appearance, or general quality or amenity value will not be supported.*

*2.2 The provision of high-quality local green spaces and opportunities for outdoor recreation space and/or access to these via green routes should be a priority of all developments.*

*2.3 The areas listed below are designated as Local Green Spaces and subject to this policy. (They are shown on Map 8 (Local Green Spaces) and their designation is shown in the listing entitled Designated Local Green Spaces on Page 28).*

*1 Saunders Wood*

*2 Collar Makers Green*

*3 Hills Court Nature Path*

*4 Street End Field and Discovery Field*

*5 Ash War Memorial*

*6 St Nicholas Churchyard*

*7 Ash Recreation Ground*

*8 Allotments*

*9 10 Acres Field / The Meadows*

*10 Ash Bowls Club*

*11 School Grounds (Cartwright and Kelsey CoE Primary School)*

*12 School Grounds (St Faiths at Ash Prep School)*

*13 Pound Corner.”*

**13.33 Policy ANP3 Green and open spaces in new developments states:**

*“Developments of five or more dwellings should provide appropriate green and open spaces, in accordance with the District Council’s standards, for residents’ health and well-being and recreational use, and:*

*3.1 Provide high quality, open green spaces and opportunities for recreational space and/or access to these via green routes, as a priority of all developments, and developers should refer to the Kent County Council ROWIP, PRoW’s and “Access Good Design Guidance”;*

*3.2 Provide green infrastructure linking new developments to existing corridors and provide access by foot or cycle to and around the village and public amenities; and*

*3.3 Should be sensitive to the rural setting, relate to the existing landscape and enhance the built environment.”*

**13.34 Policy ANP6 Developments and Conservation states:**

*“Proposals for new development in the Plan area should comply with all relevant Policies in this Plan. Proposals which assist in delivering the social and environmental aims of the Plan will be supported. In particular, proposals will be supported which:*

*6.1 Demonstrate a high standard of design which respects and reinforces the local distinctiveness of its location, surroundings and the individual character areas of the Parish, as described in the Ash Character Assessment (2018).*

*6.2 Building design should respect and respond to the village setting, taking account of the Ash Design Guide, in relation to: a) scale, density, massing, height of nearby buildings, orientation, use of local natural materials, fenestration, landscape layout and access; and b) the scale, design and materials of the street furniture in the public realm (highways, footways, open spaces and landscape).*

*6.3 Buildings should take account of landform, layout, building orientation, massing and landscape to minimise energy consumption.*

*6.4 All new developments should be designed to avoid increased vulnerability to the impacts of climate change by: a) ensuring development schemes demonstrate how adaption measures and sustainable development principles have been incorporated into the design and proposed implementation; b) planning applications which use the Home Quality Mark and Passivhaus design standards will be positively supported; c) conversions and extensions of 500 sq.m. of residential floorspace or above, or five or more dwellings, to achieve ‘excellent’ in BREEAM domestic refurbishment; and d)*

*expect non-domestic developments over 500 sq.m. of floorspace or above, to achieve 'excellent' in BREEAM assessments and encouraging zero carbon in new developments from 2021.*

*6.5 All new developments must provide facilities for cycle storage and in the case of dwellings for the disabled and older persons, suitable access for mobility scooters.*

*6.6 Provision for electric charging points to either each dwelling or one point per five dwellings.*

*6.7 Respects, conserves and enhances the settings of Listed Buildings and street frontages as described in the Ash Character Assessment.*

*6.8 Respects the integrity, character and appearance of the conservation areas.*

*6.9 All development works should review the possibilities of archaeological finds within the site confines and seek early discussions with the Kent County Council Heritage Conservation team."*

13.35 Policy ANP7a) Agri/Cowans land brought forward from DDC 2015 Land Allocation states:

*"The site, as defined on Map 12, is allocated for residential development with an estimated capacity of 95 dwellings.*

*Development proposals should comply with all relevant Policies in this Plan.*

*Proposals which meet the following criteria will be supported:*

*7a.1 Any application for development is preceded by and is consistent with a development brief that has been agreed by Dover District Council; this must include an ecological survey;*

*7a.2 Any application of development is preceded by an archaeological assessment of the site and its submission to Kent County Council;*

*7a.3 There is a comprehensive approach to development of the whole site but if the site is developed incrementally, each phase must demonstrate that it will not prejudice the implementation of the whole development;*

*7a.4 The impact of the development on the setting of the village and wider landscape is minimised by reference to Policies ANP4, ANP5 and ANP6;*

*7a.5 The existing boundary hedgerows and vegetation are retained and enhanced as part of the development;*

*7a.6 Vehicular access to the site is from Sandwich Road and New Street;*

*7a.7 There is no vehicular access to the site from Cherry Garden Lane;*

*7a.8 Open and/or shared spaces should be maintained by a management company established by the developer with on-going maintenance responsibilities being held by this company; and*

*7a.9 Development should ensure that occupation is phased to align with the delivery of sewerage infrastructure, provide connection to gas supply and ensure future access to existing water supply and/or wastewater infrastructure for maintenance and capacity improvements.”*

## **I4.0 APPENDIX IV: LVA FIGURES**



















# RHLA LTD

Project Title  
**Former Archway Filling Station**

Client  
**Former Archway Filling Station**

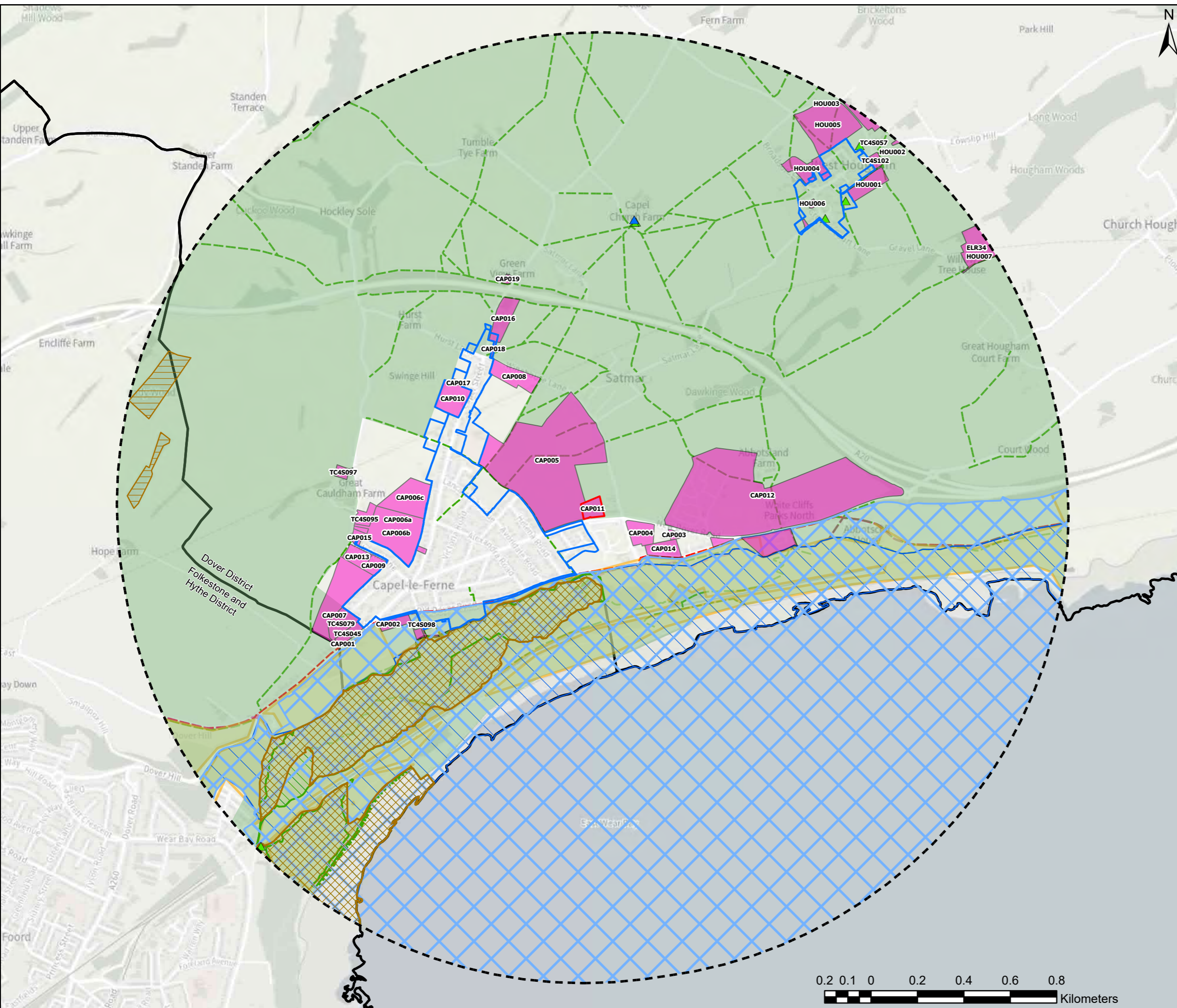
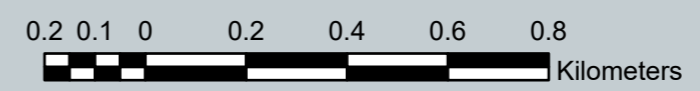
Drawing Title  
**Site Context**

General Notes  
1. Do not scale from this drawing.  
2. All dimensions, co-ordinates and levels are shown in meters unless otherwise stated.

-  2km Study Area
-  Site Boundary
- Dover District Local Plan**
-  Settlement Boundary
-  Housing Allocation
- Heritage**
-  Grade I Listed Building
-  Grade II Listed Building
-  Country Parks
-  Scheduled Monuments
-  Heritage Coast
- Ecology**
-  Local Nature Reserves
-  Site of Special Scientific Interest
-  Ancient Woodland
- Landscape**
-  Area of Outstanding Natural Beauty (AONB)
-  Open Access Land
-  National Trails
-  Public Right of Way
-  Sustrans National Route
-  Local Authority Boundary

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Revision	By/Check	Date	Suffix
Drawn DB	Review EB	Approved RH	Date 2023-10-05
Drawing No <b>FIGURE 1</b>			Rev <b>XX</b>











# RHLA LTD

Project Title  
Former Archway Filling Station

Client  
Former Archway Filling Station

Drawing Title  
Screened Zone of Theoretical Visibility

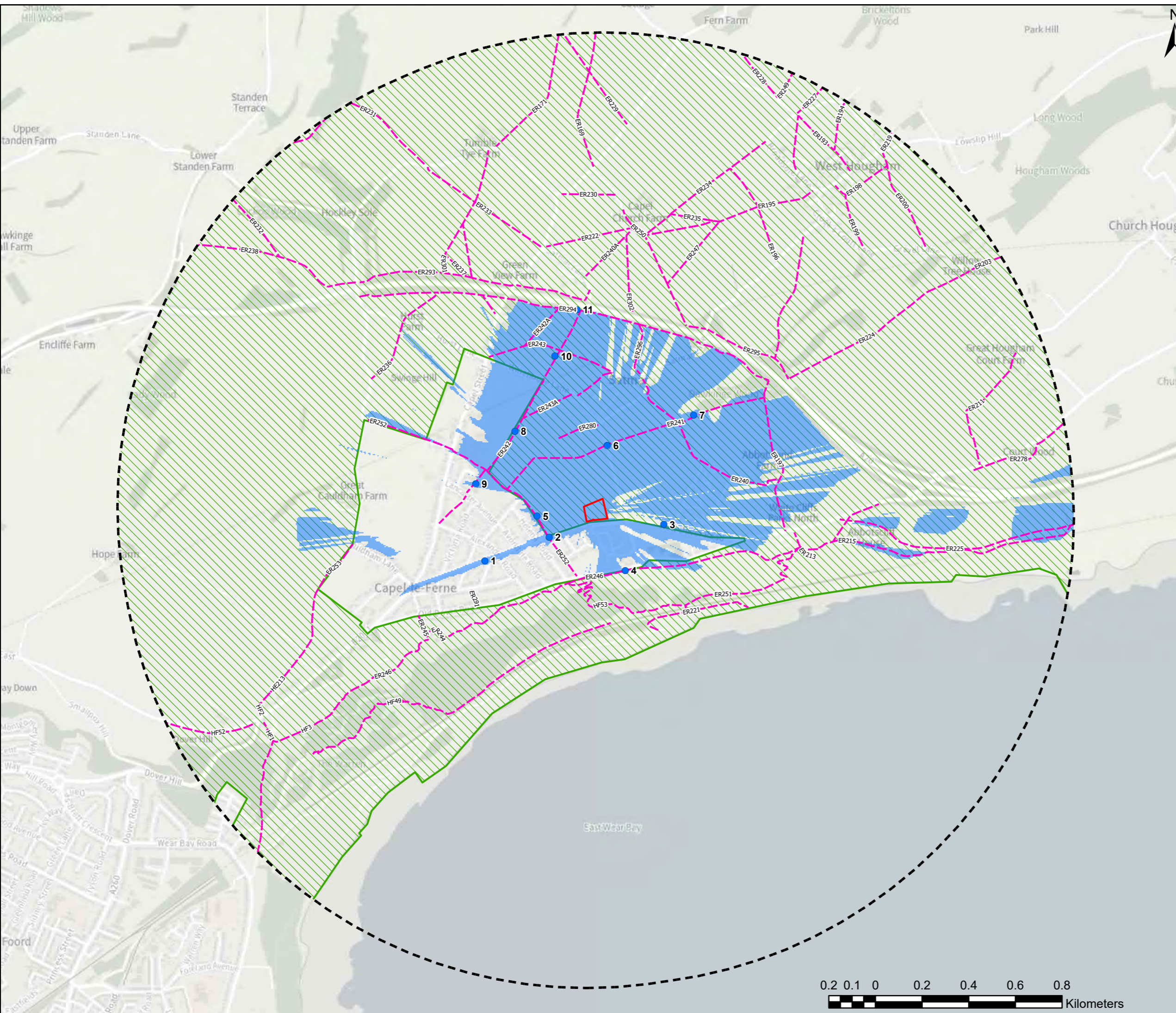
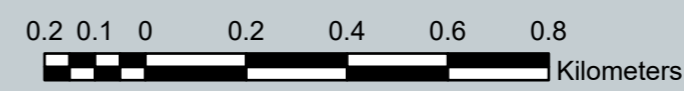
General Notes  
1. Do not scale from this drawing.  
2. All dimensions, co-ordinates and levels are shown in meters unless otherwise stated.

-  2km Study Area
-  Site Boundary
-  Public Right of Way
-  Zone of Theoretical Visibility
-  Area of Outstanding Natural Beauty (AONB)
-  Viewpoints

**Screened ZTV Production Information -**  
 - DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).  
 - Additional Woodland and Buildings within study area are modelled at 15m and 8m respectively.  
 - Viewer height set at 1.7m  
 - Calculations include earth curvature and light refraction  
 N.B. This Screened Zone of Theoretical Visibility (SZTV) image illustrates the theoretical extent of where the development will be visible from, assuming 100% visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

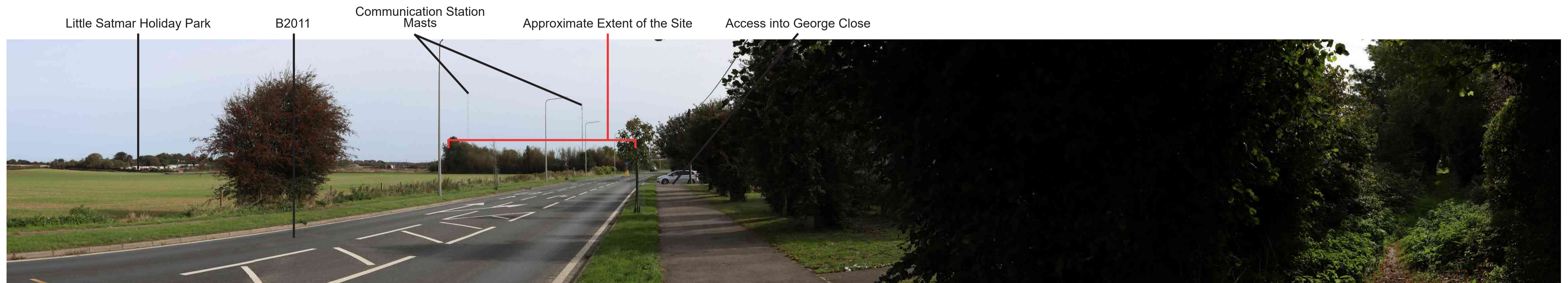
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Revision	By/Check	Date	Suffix
Drawn DB	Review EB	Approved RH	Date 2023-10-03
Drawing No FIGURE 2			Rev -





Viewpoint 1 - View from the B2011 (New Dover Road) looking east  
 Approximate Distance to Site: 475m



Viewpoint 2 - View from the B2011 (New Dover Road) looking east  
 Approximate Distance to Site: 75m

- Notes:
- Camera: Canon EOS 6D
  - Camera Height: 1.6m
  - Weather: Clear to light cloud
  - Photos Taken: 06/10/2023

- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date: 07/10/2023	Project Name: Former Archway filling station	Title: Type 1 Viewpoint Photography
Scale: n/a	Client Name: Guardian Parks Ltd	Figure Ref: Figure 3

**RHLA LTD**  
 Landscape Planning Consultancy



Viewpoint 3 - View from the B2011 (New Dover Road) looking west  
 Approximate Distance to Site: 200m



Viewpoint 4 - View from PRoW (footpath) 0052/ER246/13 looking north  
 Approximate Distance to Site: 240m

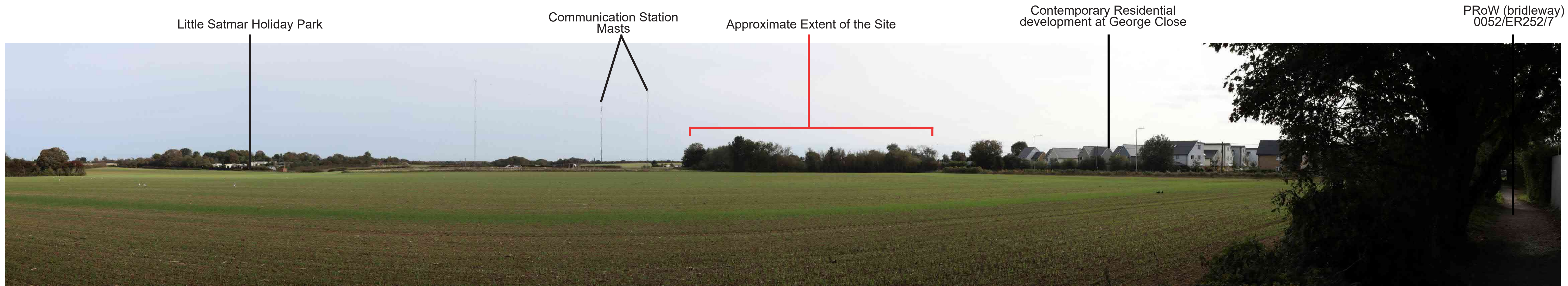
**Notes:**

- Camera: Canon EOS 6D
- Camera Height: 1.6m
- Weather: Clear to light cloud
- Photos Taken: 06/10/2023

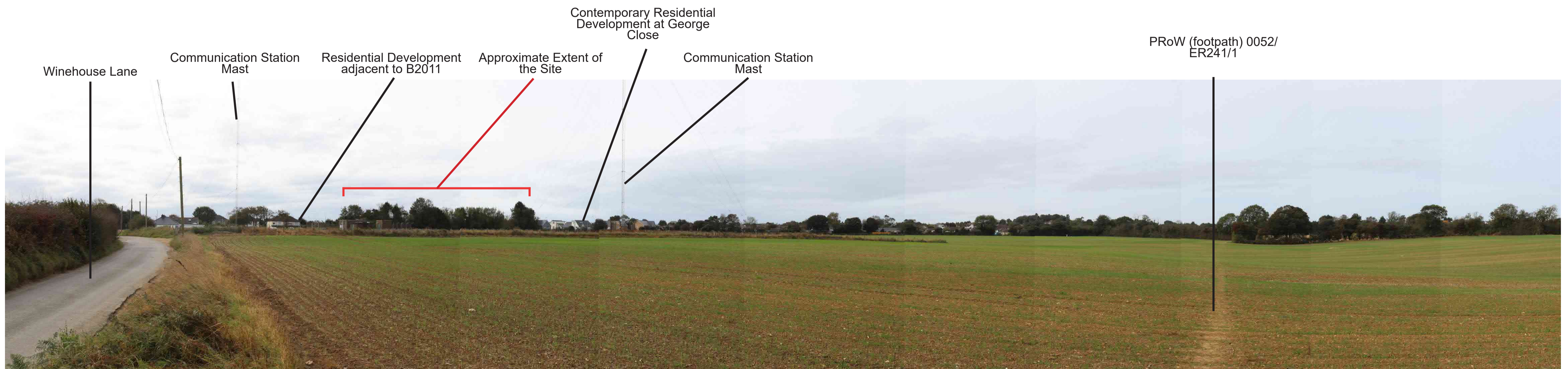
- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date: 07/10/2023	Project Name: Former Archway filling station	Title: Type 1 Viewpoint Photography
Scale: n/a	Client Name: Guardian Parks Ltd	Figure Ref: Figure 4

**RHLA LTD**  
 Landscape Planning Consultancy



Viewpoint 5 - View from PRoW (bridleway) 0052/ER252/7 looking east  
 Approximate Distance to Site: 230m



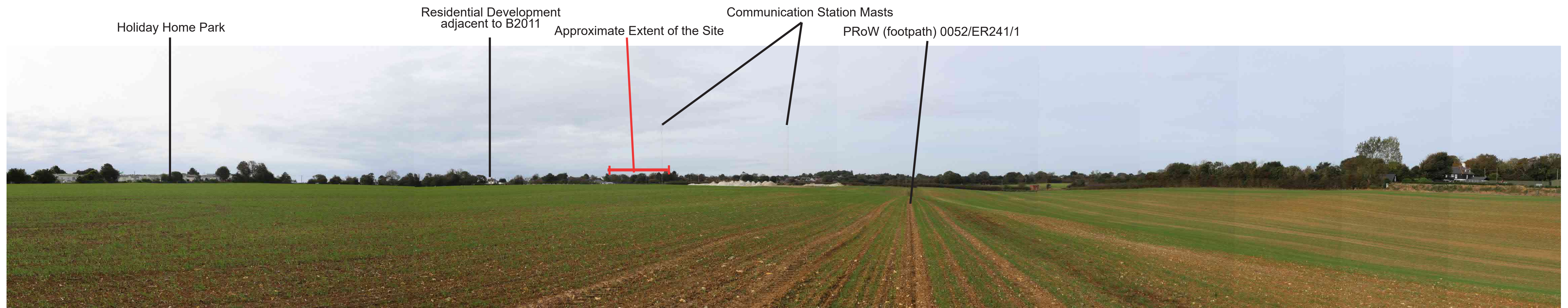
Viewpoint 6 - View from PRoW (footpath) 0052/ER241/1 looking south-west  
 Approximate Distance to Site: 230m

**Notes:**

- Camera: Canon EOS 6D
- Camera Height: 1.6m
- Weather: Clear to light cloud
- Photos Taken: 06/10/2023

- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date: 07/10/2023	Project Name: Former Archway filling station	Title: Type 1 Viewpoint Photography
Scale: n/a	Client Name: Guardian Parks Ltd	Figure Ref: Figure 5



Viewpoint 7 - View from PRoW (footpath) 0052/ER241/1 looking south-west  
 Approximate Distance to Site: 560m



Viewpoint 8 - View from PRoW (footpath) 0052/ER242/5 looking south  
 Approximate Distance to Site: 505m

**Notes:**

- Camera: Canon EOS 6D
- Camera Height: 1.6m
- Weather: Clear to light cloud
- Photos Taken: 06/10/2023

- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date: 07/10/2023	Project Name: Former Archway filling station	Title: Type 1 Viewpoint Photography
Scale: n/a	Client Name: Guardian Parks Ltd	Figure Ref: Figure 6



Viewpoint 9 - View from PRoW (footpath) 0052/ER242/6 looking north-east  
 Approximate Distance to Site: 470m



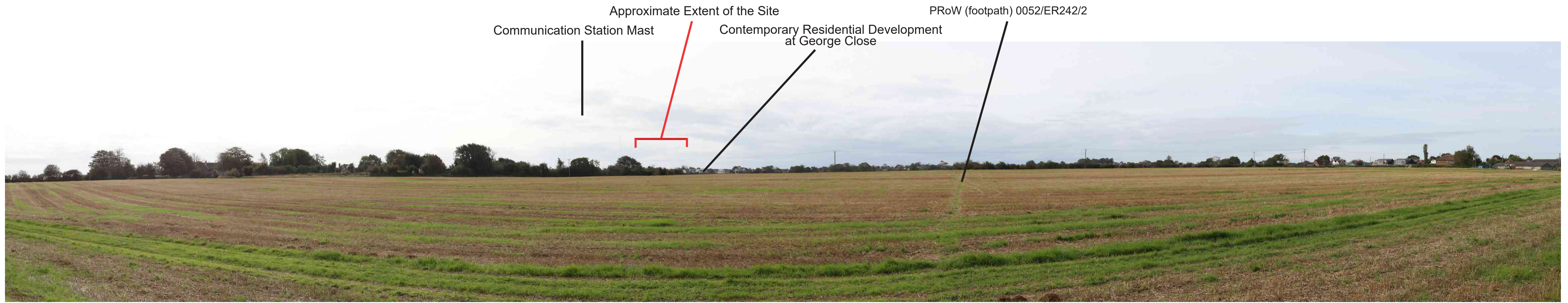
Viewpoint 10 - View from PRoW (footpath) 0052/ER242/2 looking south  
 Approximate Distance to Site: 700m

Notes:

- Camera: Canon EOS 6D
- Camera Height: 1.6m
- Weather: Clear to light cloud
- Photos Taken: 06/10/2023

- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date: 07/10/2023	Project Name: Former Archway filling station	Title: Type 1 Viewpoint Photography
Scale: n/a	Client Name: Guardian Parks Ltd	Figure Ref: Figure 7



Viewpoint 11 - View from PRoW (footpath) 0052/ER242/2 and ER294/4 looking south  
 Approximate Distance to Site: 830m

**Notes:**

- Camera: Canon EOS 6D
- Camera Height: 1.6m
- Weather: Clear to light cloud
- Photos Taken: 06/10/2023

- Type 1 visualisation prepared in accordance with LI Technical Guidance Note06/19.
- This visualisation represents the context of the scheme and key features.
- The viewpoint locations were recorded using a handheld GPS.

Date:	07/10/2023	Project Name:	Former Archway filling station	Title:	Type 1 Viewpoint Photography
Scale:	n/a	Client Name:	Guardian Parks Ltd	Figure Ref:	Figure 8

APPENDIX

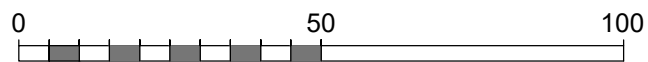
B







Rev	Date	Description



APX ARCHITECTURE



Kemp House, 160 City Road,  
London, EC1V 2NX

Client / Project  
**Proposed residential development Land  
 at the Former Archway Filling Station**  
 New Dover Road  
 Capel-Le-Ferne  
 Folkestone  
 Kent

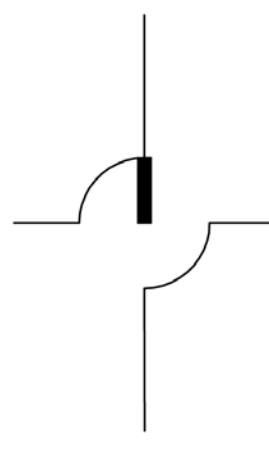
Drawing Description  
**Site Location Plan**

Scale  
**1:1250@A3**

Drawing Number  
**23\_67\_01**

Date  
**October 2023**

Revision



revisions

0 5 10 15 20 25 30 35 40 45

MPX ARCHITECTURE



100 City Road,  
London SE17 2NR

project title

Proposed residential development Land  
at the Former Archway Filling Station  
New Dover Road  
Capel-Le-Ferne  
Folkestone  
Kent

drawing title

Sketch Layout Plan

scale

1:500@A1

drawing number

23\_67\_SK01

date

October 2023

revision

APPENDIX

C



**Flood Risk Assessment  
Archway Filling Station  
New Dover Road  
Capel-le-Ferne  
CT18 7JD**

RMB Consultants (Civil Engineering) Ltd  
August 2023

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## **1. Background and Introduction**

This flood risk assessment supports a proposed Local Plan allocation for development at Archway Filling Station, New Dover Road, Capel-le-Ferne, CT18 7JD.

The proposed development is for residential use.

## 2. Development Location and Description

The site is situated to the north of New Dover Road, Capel-le-Ferne, Figure 1.

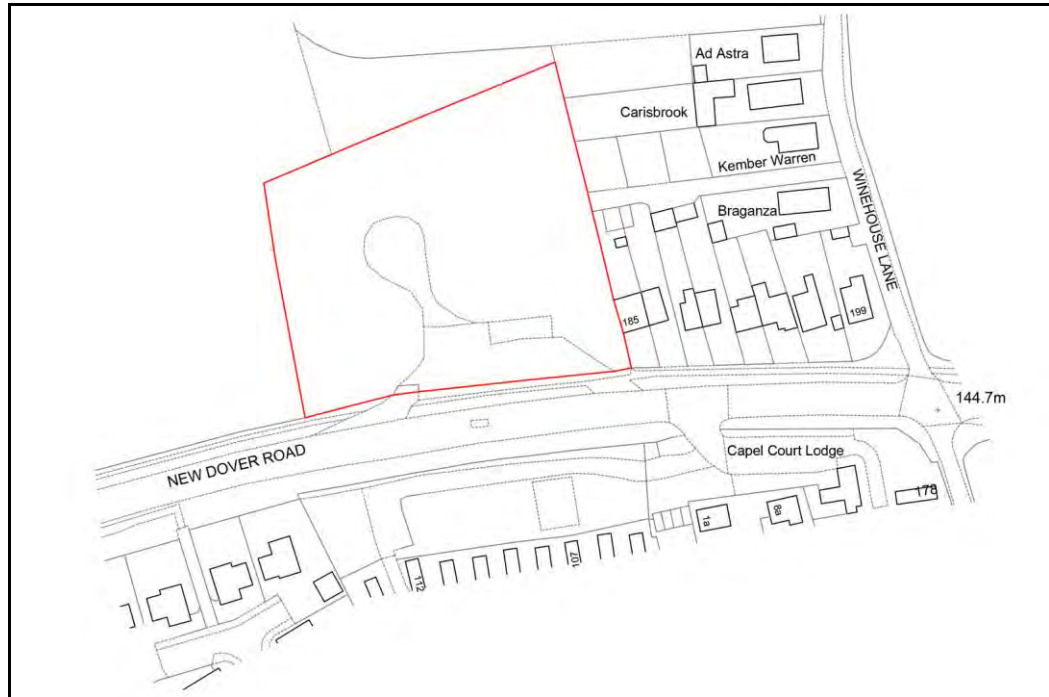


Figure 1. Site location plan.

The existing site was previously used as a fuel filling station. All that remains is an area of hardstanding associated with the filling station plus the original entrance and exit accesses. There are rubble spoil heaps within the site, the remains of the previous development. The site covers approximately 0.65ha.

### Development Proposals

The proposed allocation is for residential development for an estimated 18 dwellings.



### 3. Policy Background

#### The National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Chapter 14 Meeting the challenge of climate change, flooding and coastal change states:

#### *Planning and flood risk*

159. *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
160. *Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.*
161. *All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*
- a) *applying the sequential test and then, if necessary, the exception test as set out below;*
  - b) *safeguarding land from development that is required, or likely to be required, for current or future flood management;*
  - c) *using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, ( making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
  - d) *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*

162. *The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*
163. *If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.*
164. *The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:*
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
  - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*
165. *Both elements of the exception test should be satisfied for development to be allocated or permitted.*
166. *Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.*
167. *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
  - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
  - d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*
168. *Applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 55.*
169. *Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*
- a) take account of advice from the lead local flood authority;*
  - b) have appropriate proposed minimum operational standards;*
  - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
  - d) where possible, provide multifunctional benefits.*

The aim of the NPPF is to steer new development to areas with the lowest probability of flooding. The flood zones are the starting point for this sequential approach. Zones 2 and 3 are shown on the Flood Map for Planning with flood zone 1 being all the land falling outside zones 2 and 3. These flood zones refer to the probability of sea and river flooding only, ignoring the presence of existing defences:

**Zone 1 Low Probability** - land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

**Zone 2 Medium Probability** - land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year.

**Zone 3a High Probability** - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

**Zone 3b The Functional Floodplain** - land where water has to flow or be stored in times of flood, land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or designed to flood in an extreme flood.

The Planning Practice Guidance that accompanies the NPPF recognises that the type of development affects its vulnerability to flooding. Table 1 details development vulnerability classification and flood zone compatibility.

Residential development is classified as More Vulnerable and is considered appropriate in flood zones 1, 2 and 3a, providing the Exception Test is passed.

Where there are no reasonably available sites in flood zone 1, local planning authorities allocating land in local plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in flood zones 1 or 2 should the suitability of sites in flood zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

In some areas where developable land is in short supply there can be an overriding need to build in areas that are at risk of flooding. In such circumstances, the application of the Sequential Test is used to ensure that the lower risk sites are developed before the higher risk ones.

<b>Flood Risk Vulnerability Classification</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3a</b>	<b>Zone 3b</b>
<p><b>Essential Infrastructure</b></p> <p>Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</p> <p>Essential utility infrastructure.</p>	✓	✓	e	e*
<p><b>Highly Vulnerable</b></p> <p>Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</p> <p>Emergency dispersal points.</p> <p>Basement dwellings.</p> <p>Caravans, mobile homes and park homes intended for permanent residential use.</p>	✓	e	x	x
<p><b>More Vulnerable</b></p> <p>Hospitals.</p> <p>Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</p> <p>Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</p> <p>Non-residential uses for health services, nurseries and educational establishments.</p> <p>Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</p>	✓	✓	e	x
<p><b>Less Vulnerable</b></p> <p>Police, ambulance and fire stations which are not required to be operational during flooding.</p> <p>Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in "more vulnerable", and assembly and leisure.</p> <p>Land and buildings used for agriculture and forestry.</p>	✓	✓	✓	x
<p><b>Water Compatible Development</b></p> <p>Flood control infrastructure.</p> <p>Water transmission infrastructure and pumping stations.</p> <p>Sewage transmission infrastructure and pumping stations.</p> <p>Sand and gravel working.</p> <p>Docks, marinas and wharves.</p> <p>Water-based recreation (excluding sleeping accommodation).</p> <p>Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</p> <p>Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</p>	✓	✓	✓	✓*
<p><b>Key:</b></p> <p>✓ Development is appropriate</p> <p>x Development should not be permitted</p> <p>e Exception Test required</p> <p>NB. Shortened list of development types shown.</p>				

Table 1. Vulnerability classification and flood zone compatibility.

## **Local Development Documents**

### **Dover District Council Core Strategy 2010**

Dover District Council's Local Development Framework Core Strategy was adopted in February 2010. The following policies are relevant to the site.

#### ***Policy DM 17***

##### ***Groundwater Source Protection***

*Within Groundwater Source Protection Zones, shown on the Proposals Map, the following will not be permitted in Zones 1 and 2 unless adequate safeguards against possible contamination are provided:*

- i. Septic tanks, storage tanks containing hydrocarbons or any chemicals, or underground storage tanks;*
- ii. Proposals for development which may include activities which would pose a high risk of contamination unless surface water, foul or treated sewage effluent, or trade effluent can be directed out of the source protection zone;*
- iii. Proposals for the manufacture and use of organic chemicals, particularly chlorinated solvents;*
- iv. Oil pipelines;*
- v. Storm water overflows;*
- vi. Activities which involve the disposal of liquid waste to land; and*
- vii. Sustainable urban drainage systems.*

*New graveyards will not be permitted in Zone 1. Farm waste, storage areas, new foul or combined sewerage systems will also not be permitted in Zone 1 unless adequate safeguards are provided.*

### **Dover District Council Strategic Flood Risk Assessment 2019**

Dover District Council Strategic Flood Risk Assessment (SFRA) was published in March 2019.

#### 4. Site Characteristics

**Geology and Soils** - The bedrock geology consists of the New Pit Chalk Formation, chalk. The superficial geology consists of the Clay-with-Flints Formation, clay, silt, sand and gravel. The soils are characterised as loamy and clayey soils with impeded drainage draining to the stream network. Records from a borehole sunk at Great Cauldham Farm, 1km west of the site indicate that the Clay-with-Flints Formation is approximately 9m deep and consists of clay.

**Groundwater** - The site lies within the Total Groundwater Source Protection Zone (zone 3). Records from the borehole sunk at Great Cauldham Farm indicate a groundwater level of 78.60m AOD (Above Ordnance Datum).

**Sewer Record** - The nearest public foul sewer is at the southeast corner of the site, Figure 2. The invert level manhole 5702 is 143.36m AOD. There are no public surface water sewers in the vicinity of the site.



Figure 2. Public sewer record. (© Southern Water).

**Site Specific Topographic Data** - Contours have been derived from Lidar data. The wider area is shown in Figure 3. The land falls from west to east at a gradient of approximately 1 in 90. The site is at approximately 145 - 146m AOD. Figure 4 shows contours at 0.1m spacing. These contours show the rubble spoil heaps that are left on the site creating artificial high and low points.

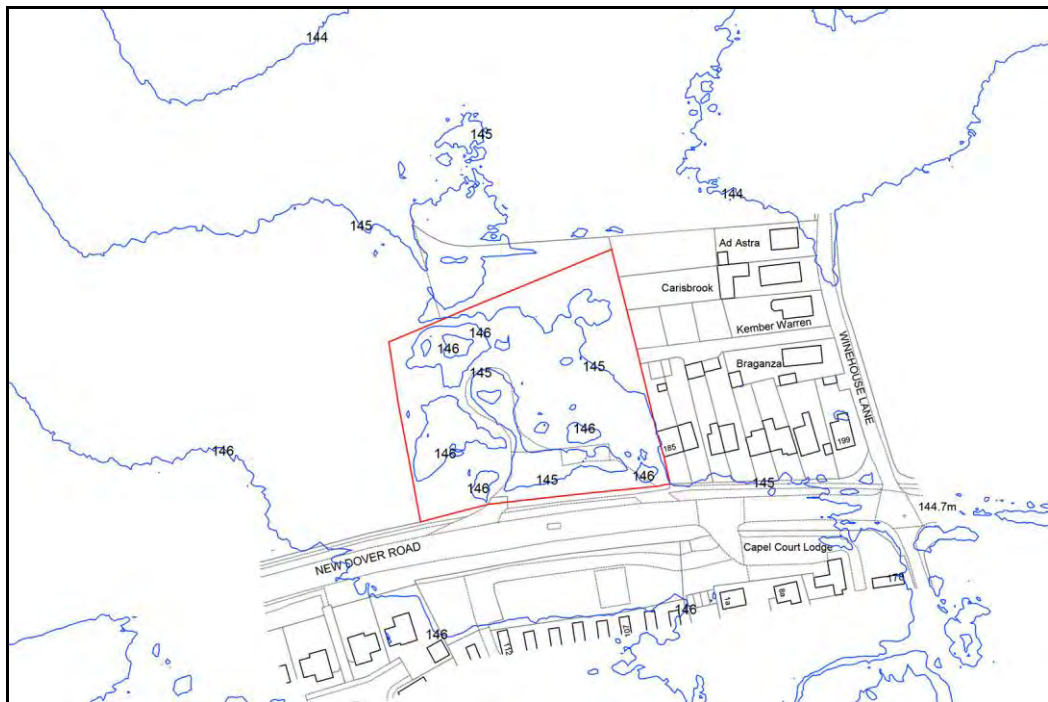


Figure 3. Contours derived from Lidar data.



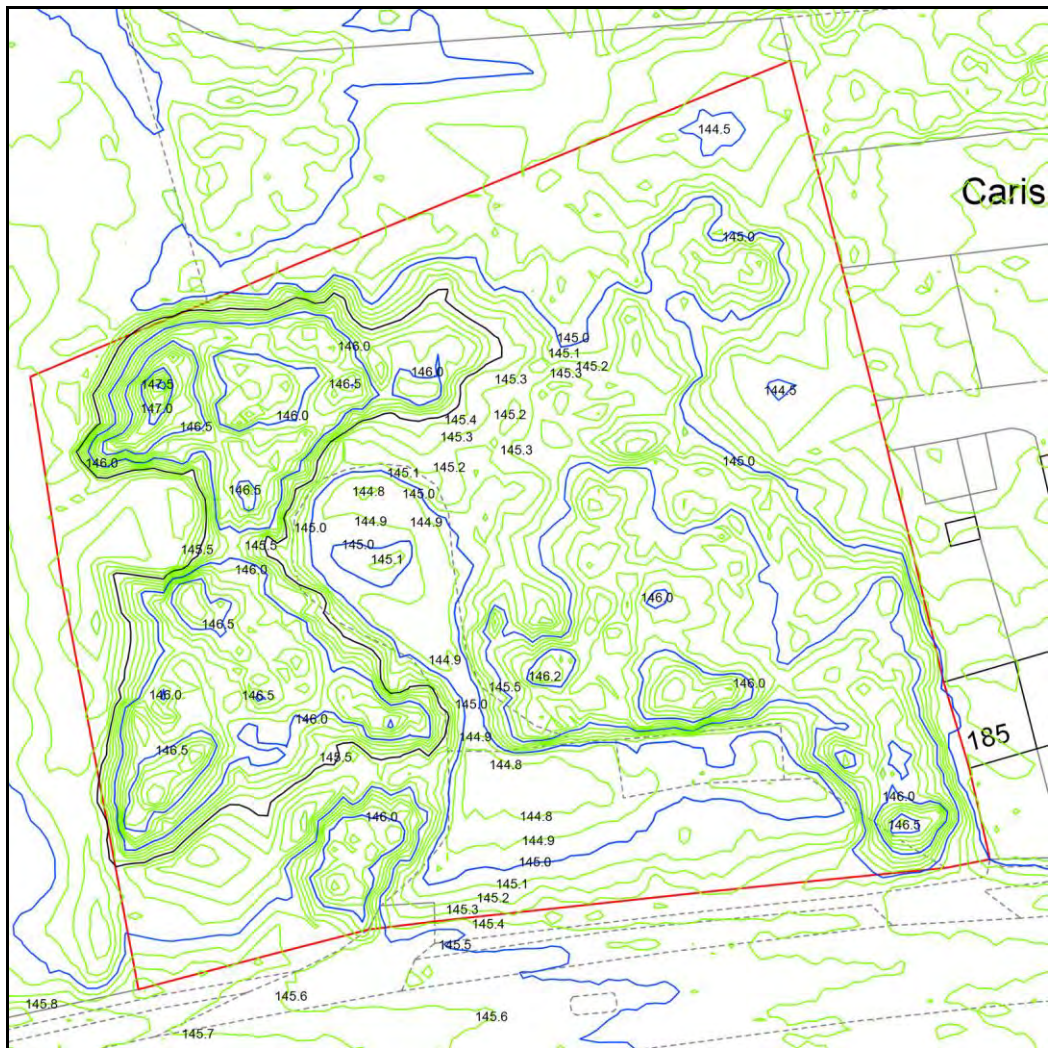


Figure 4. Site contours derived from Lidar data.

**Existing Development** - The existing site consists of impermeable hardstanding which used to be the filling station access and forecourt plus rubble spoil heaps.

**Infiltration Rates** - Site investigation has not been carried out. Infiltration rates for common types of soil are shown in Table 2.

Soil Type	Infiltration Rate <i>f</i>
gravel	$2.8 \times 10^{-3}$ to 0.28 m/s
sand	$2.8 \times 10^{-5}$ to 0.028 m/s
loamy sand	$2.8 \times 10^{-6}$ to $2.8 \times 10^{-4}$ m/s
sandy loam	$1.4 \times 10^{-5}$ to $1.4 \times 10^{-4}$ m/s
loam	$2.8 \times 10^{-7}$ to $2.8 \times 10^{-5}$ m/s
silt loam	$1.4 \times 10^{-7}$ to $2.8 \times 10^{-5}$ m/s
chalk	$2.8 \times 10^{-7}$ to 0.028 m/s
sandy clay loam	$2.8 \times 10^{-7}$ to $2.8 \times 10^{-5}$ m/s
clayey gravels	$1.0 \times 10^{-8}$ to $1.0 \times 10^{-6}$ m/s
clayey sands	$1.0 \times 10^{-9}$ to $1.0 \times 10^{-6}$ m/s

Table 2. Infiltration rates for typical soils.

An infiltration rate of  $1 \times 10^{-4}$  m/s has been assumed for deep infiltration structures within the chalk.

**Greenfield Runoff Rate** - The greenfield runoff rate for the critical storm durations for the site has been calculated using the IH124 method from the greenfield runoff rate estimation tool published online by HR Wallingford at uksuds.com. The peak runoff is shown in Table 3.

Return Period	Runoff Rate Q l/s
	per ha.
QBar	0.18
1	0.16
30	0.42
100	0.59

Table 3. Greenfield runoff rate for the site.

**Rainfall Data** - Point rainfall data has been obtained from the Flood Estimation Handbook (FEH) Web Service. The FEH 2022 XML rainfall data has been used in the surface water drainage design. This provides rainfall data for return periods greater than 2 years.

## 5. Definition of the Flood Hazard

To define the flood hazard, data has been collected from several sources.

**Flood Map for Planning** - The Flood Map for Planning shows that the site lies in flood zone 1, Figure 5.

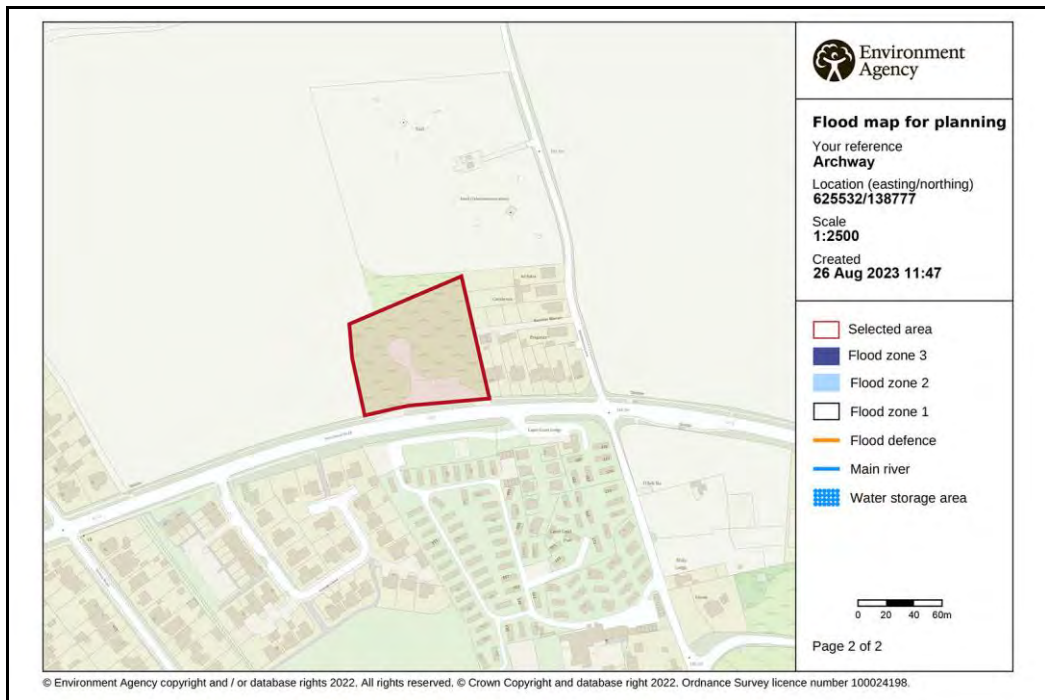


Figure 5. Flood Map for Planning.

The following sources of flooding could affect the site:

### Tidal (Sea)

The lowest site level is 144.8mAOD. The site is not at risk of tidal flooding.

### Fluvial (River)

The lowest site level is 144.8mAOD. There are no watercourses in the vicinity of the site. The site is not at risk of fluvial flooding.

### Surface Water

The Government has published surface water flood risk maps. The site is at very low to medium risk of surface water flooding, Figure 6.

The definition of each category is given below:

**Very Low (white)** a chance of flooding of less than 1 in 1000 (0.1%)

**Low (pale blue)** a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%)

**Medium (mid blue)** a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%)

**High (dark blue)** a chance of flooding of greater than 1 in 30 (3.3%)

The depth of water associated with the low, medium and high risk surface water flood events is shown in Figures 7 - 9. The definition of each colour is given below:

**Below 300mm (light blue)**

**300-900mm (medium blue)**

**Over 900mm (dark blue)**



Figure 6. Surface water flood map.



Figure 7. Surface water flood depth map for the low risk flood event.



Figure 8. Surface water flood depth map for the medium risk flood event.

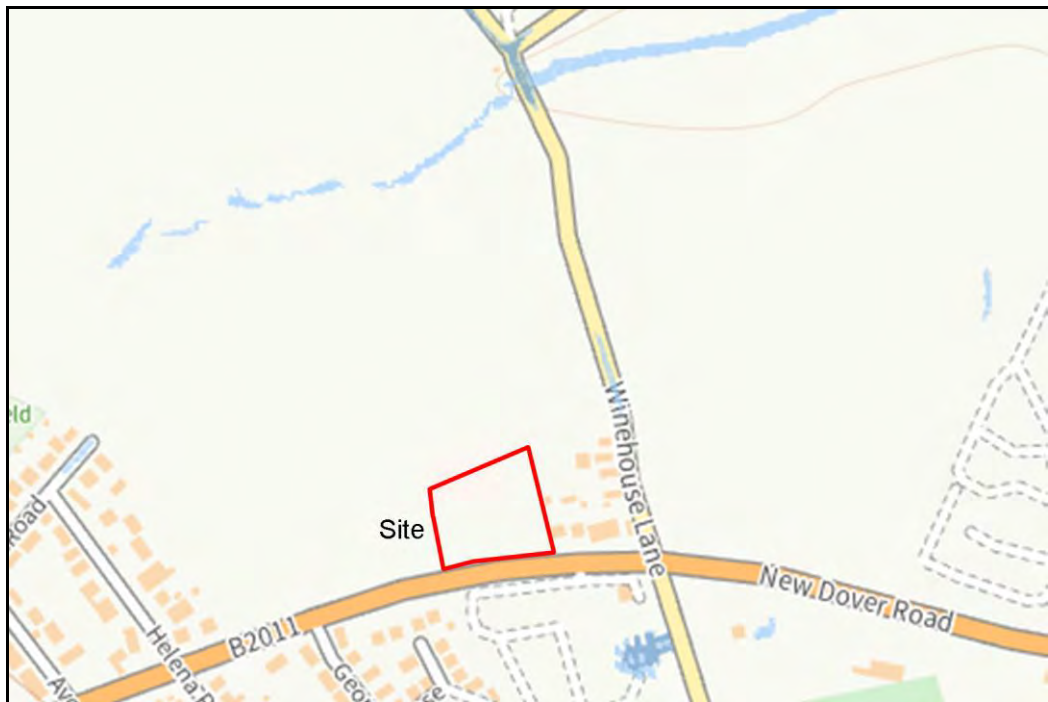


Figure 9. Surface water flood depth map for the high risk flood event.

The surface water flood maps also give an indication of velocity and direction of flow, Figure 10. The definition of each colour is given below:

**Over 0.25 m/s (dark blue)**

**Less than 0.25 m/s (light blue)**

The surface water flooding is generated within the site. The velocity maps show no link between New Dover Road and the site. Surface water from New Dover Road runs west to east along the road and then north along Winehouse Lane.



Figure 10. Surface water flood velocity map for the low risk flood event.

The surface water flood depths are available as a GIS dataset. This data splits flood depths into a greater number of categories. The GIS dataset has been overlaid on the site for the medium and low risk flood events, Figures 11 and 12.

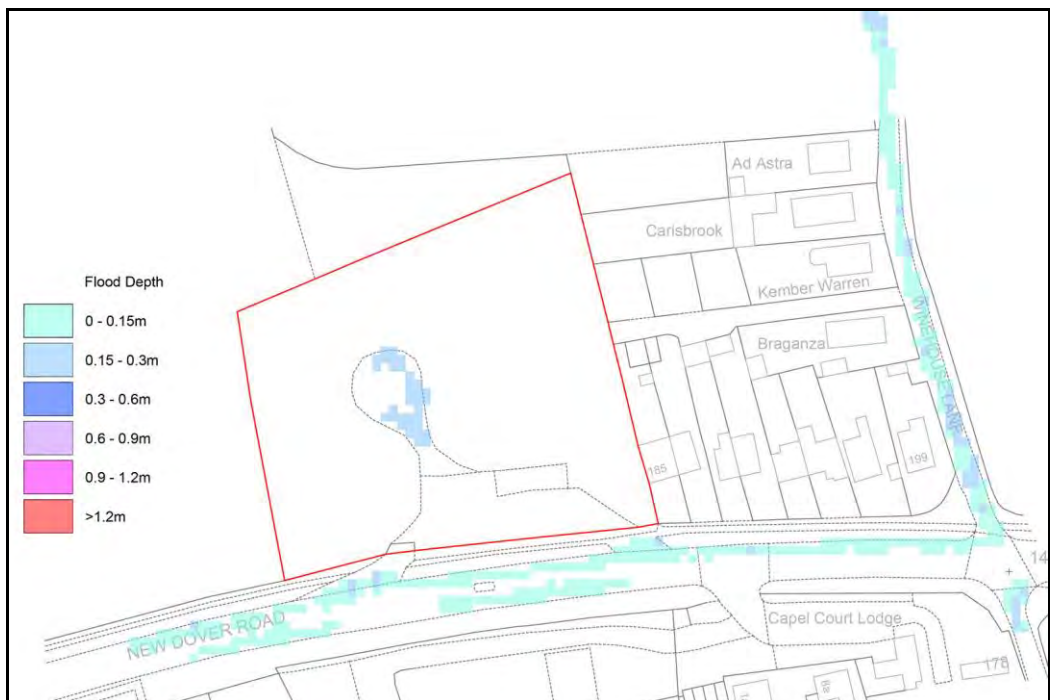


Figure 11. Surface water flood mapping from GIS files overlaid on the site for the medium risk flood event.



Figure 12. Surface water flood mapping from GIS files overlaid on the site for the low risk flood event.

The design flood event is the 1 in 100 year (1% Annual Exceedance Probability) event plus climate change. The medium flood risk model represents the 1 in 100 year rainfall event. There is only minor flooding to the centre of the site under the modelled 1 in 100 year event to a depth of 0.15 - 0.3m. Under the 1 in 1000 year (0.1% Annual Exceedance Probability) low risk event there is flooding at the centre of the site and to the northeast corner to a depth of 0 - 0.6m.

The surface water flood modelling data is assigned a suitability rating. The suitability ratings are shown in Table 4, with the rating for the site shown highlighted. At the *County to Town* level the modelling is unlikely to be reliable for a local area.



Indicative suitable scale	Indicative suitable use	How reliable is this for a local area?	How reliable is this for an individual property?
<b>National to county</b> - suitable for identifying which parts of countries or counties are at risk, or which countries or counties have the most risk.	Suitable for identifying areas with a natural vulnerability to flood first, deepest or most frequently.	Very unlikely to be reliable for a local area.	Extremely unlikely to be reliable for identifying individual properties at risk.
<b>County to town</b> - suitable for identifying which parts of counties or towns are at risk, or which counties or towns have the most risk.	Suitable for identifying approximate extents, shallower and deeper areas.	Unlikely to be reliable for a local area.	Very unlikely to be reliable for identifying individual properties at risk.
<b>Town to street</b> - suitable for identifying which parts of towns or streets are at risk, or which towns or streets have the most risk.	Suitable for identifying flood extents, approximate depth of flooding, and identifying streets at risk of flooding.	Likely to be reliable for a local area (and so the information is suitable for areas of land, not individual properties).	Unlikely to be reliable for identifying individual properties at risk (and so the information is suitable for areas of land, not individual properties).
<b>Street to parcels of land</b> - suitable for identifying which parts of streets or parcels* of land are at risk, or which streets or parcels of land have the most risk.	Suitable for identifying flood extents, depths and approximate velocities.	Very likely to be reliable for a local area (and so the information is suitable for areas of land, not individual properties).	Likely to be reliable for identifying individual properties at risk (though not whether they flood internally, so the information is suitable for areas of land, not individual properties).
<b>Property (including internal)</b> - suitable for identifying which parts of a property are at risk (including internal / external distinction), or which properties have the most risk.	Suitable for identifying flood extents, depths, velocities, and distinguishing between street and property flooding.	Extremely likely to be reliable for a local area.	Likely to be very reliable at identifying individual properties at risk, including depths of flooding internally (this provides a genuine property level assessment).

Table 4. Surface water flood modelling suitability.

The modelling carried out to produce the surface water flood maps, by necessity, makes broad assumptions. Structures, such as bridges, culverts and weirs, and flood risk management infrastructure, such as defences, are not represented. The modelling includes a general allowance for drainage but does not include specific outlets. The suitability rating indicates that the modelling is considered suitable for identifying approximate extents, shallower and deeper areas.

### Groundwater

Records from the borehole sunk at Great Cauldham Farm indicate a groundwater level of 78.60mAOD (Above Ordnance Datum). This is approximately 66.2m below the lowest site level. The risk of groundwater flooding is therefore considered to be very low.

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### **Infrastructure Failure**

Public foul sewers run west to east along New Dover Road. A significant volume of water would be required to cause water to break the surface. Should it do so, it would flow east along New Dover Road and north along Winehouse Lane as shown by the surface water modelling, low risk velocity maps. The site is also not at risk from reservoir flooding. The site is at very low risk from flooding from infrastructure failure.

## 6. Probability of Flooding

The probability of flooding from each source is summarised in Table 5.

Source of Flooding	Probability
Tidal	Very Low
Fluvial	Very Low
Surface Water	Very Low - Medium
Groundwater	Very Low
Infrastructure	Very Low

Table 5. Summary of flood risk.

### Surface Water

The greatest risk of flooding at the site is from surface water.

Under the low risk event the surface water flood maps shown no link between New Dover Road and the site. This indicates that the flooding at the centre of the site is entirely generated from within the site. The flood risk maps are based on a ground level generated from Lidar data. This data identifies the rubble spoil heaps as ground level and therefore gives an artificial ground level creating a hollow at the centre of the site which was not originally there nor would be following development.

Once the site is regraded there will not be a depression at the centre of the site and the surface water flow path will be to the northeast following the wider contours.

Positive drainage will be introduced to dispose of runoff from the development, see Chapter 9. The surface water flood modelling does not include drainage. Following development the volume of water generated from within the site that is not captured by drainage will be significantly lower than identified within the modelling.

Once the site has been reprofiled the surface water flooding at the site will be shallow. The residual risk of surface water flooding to buildings will be minimised as the finished ground floor levels will be at least 150mm above the ground level. Roads will be lower than floor levels by at least 250mm allowing for a 100mm kerb height. Roads and landscaping can be designed to maintain flow paths to the northeast under exceedance events and avoid built development. With these measures in place the risk of flooding from surface water will be very low and not provide any restriction on the extent of development.

## 7. Climate Change

The Environment Agency provides peak rainfall climate change allowances by management catchment. The site falls within the Rother Management Catchment. The peak rainfall allowances for the 2050s and 2070s are shown in Table 6.

Annual Exceedance Event	Central Allowance		Upper End Allowance	
	2050s	2070s	2050s	2070s
3.3%	20%	20%	40%	40%
1%	20%	20%	45%	45%

Table 6. Peak rainfall allowances.

The range is based on percentiles. The 50th percentile is the point at which half of the possible scenarios for peak rainfall intensity fall below it and half fall above it. The Central allowance is based on the 50th percentile whilst the Upper End is based on the 90th percentile.

The Central allowance is 20% and scientific evidence suggests that it is just as likely that the increase in rainfall intensity will be more than 20% as less than 20%. The Upper End allowance is 45% and current scientific evidence suggests that there is a 90% chance that peak rainfall intensity will increase by less than this value, but there remains a 10% chance that peak rainfall intensity will increase by more.

The Planning Practice Guidance suggests that flood risk assessments and strategic flood risk assessments should assess both the Central and Upper End allowances to understand the range of impact.

The surface water management strategy includes an increase of 45% in peak rainfall intensity for the calculation of storage requirements.

## 8. Detailed Development Proposals

The proposed development will be for residential use. Residential development is classed as more vulnerable and is suitable within flood zone 1.

### Sequential Test

Government Guidance *Flood risk assessment: the sequential test for applicants* states:

#### ***Developments that don't need a sequential test***

*You don't need to do a sequential test if one has already been carried out for a development of the type you're planning (eg a residential development) for your site.*

*In this case, you need to ask your local planning authority for the site allocation reference in their local plan and include it in your planning application. If the local plan hasn't been adopted, check the draft local plan.*

*You also don't need to do a sequential test if either of the following apply:*

- *your development is a minor development*
- *your development involves a change of use (eg from commercial to residential) unless your development is a caravan, camping chalet, mobile home or park home site*

*You also don't need to do a sequential test for a development in flood zone 1 unless there are flooding issues in the area of your development. You can check this in your local planning authority's strategic flood risk assessment.*

The site lies within flood zone 1. Capel-le-Ferne is not identified within the SFRA as an area at specific flood risk. The sequential test does not need to be considered for the proposed development.

### Exception Test

The site lies within flood zone 1. The exception test does not need to be considered for the proposed development.

## 9. Surface Water Management Strategy

### Objectives

The following constraints on a surface water management strategy have been identified.

- a. The geology, chalk overlain by clay-with-flints.
- b. The engineering properties of chalk.
- c. Groundwater levels are very low.
- d. There are no watercourses near the site.
- e. There are no public surface water sewers near the site.

The following surface water management options are considered below with reference to the above constraints.

- a. Infiltration into the chalk via soakaways.

### Infiltration into Chalk via Soakaways

Ciria Report C574 Engineering in chalk states:

#### **Control of drainage**

*Concentrated ingress of water into the chalk can initiate new dissolution features, particularly in low density chalk, and destabilise the loose backfill of existing ones. For this reason, any soakaways should be sited well away from foundations for structures, roads or railways, as indicated below:*

- *In areas where dissolution features are known to be prevalent, soakaways should be avoided if at all possible but, if unavoidable, should be sited at least 20m away from any foundations.*
- *Where the chalk is of low density, or its density is not known, soakaways should be sited at least 10m away from any foundations.*
- *Where the chalk is of medium density (or higher) the closest part of the soakaway should be at least 5m away from any foundations.*

Ciria Report C574 indicates that the density of the New Pit Chalk at the North Kent Downs is 1.48 - 1.99Mg/m<sup>3</sup>. Low density chalk is defined as having a dry density of < 1.55Mg/m<sup>3</sup>. The chalk is therefore likely to be of medium density or higher and any soakaways should be at least 5m from the building foundations.

Records from a borehole sunk at Great Cauldham Farm, 1km west of the site indicate that the Clay-with-Flints Formation is approximately 9m deep and consists of clay. This is unlikely to support shallow infiltration via permeable paving or soakaways. The chalk is likely to support infiltration and therefore disposal of surface water via deep bore soakaways is considered to be the most effective surface water management strategy.

The site area is approximately 0.65ha. Based on 60% of the area being covered by impermeable materials following development, runoff from 3,900m<sup>2</sup> will need to be accommodated.

FLOW software published by Causeway has been used to assess the storage requirements to discharge surface water to ground via infiltration.

The assessment is based on the following assumptions:

- Four deep bore soakaways are installed to dispose of surface water to the chalk below the clay-with-flints.
- An infiltration rate of  $1 \times 10^{-4}$  m/s has been assumed within the chalk.
- Storage is provided within attenuation storage crates.

Based on the above approximately 251m<sup>3</sup> of storage would be required. The calculations are attached at Appendix A.

This analysis indicates that it is possible to dispose of surface water runoff from the site to ground with a design that accommodates the 1 in 100 year + 45% allowance for climate change.

With a suitable surface water management strategy in place the development can minimize the onsite surface water flood risk and reduce flood risk offsite.

## 10. Conclusion

This flood risk assessment supports a proposed Local Plan allocation for development at Archway Filling Station, New Dover Road, Capel-le-Ferne, CT18 7JD.

The site is situated to the north of New Dover Road, Capel-le-Ferne. The existing site was previously used as a fuel filling station. All that remains is an area of hardstanding associated with the filling station plus the original entrance and exit accesses. There are rubble spoil heaps within the site, the remains of the previous development. The site covers approximately 0.65ha.

The proposed allocation is for residential development for an estimated 18 dwellings.

The Flood Map for Planning shows that the site lies in flood zone 1. The site is not at risk of tidal or fluvial flooding. The site is at very low risk of groundwater or infrastructure flooding. The site is at very low to medium risk of surface water flooding.

The design flood event is the 1 in 100 year (1% Annual Exceedance Probability) event plus climate change. The medium flood risk model represents the 1 in 100 year rainfall event. There is only minor flooding to the centre of the site under the modelled 1 in 100 year event to a depth of 0.15 - 0.3m. Under the 1 in 1000 year (0.1% Annual Exceedance Probability) low risk event there is flooding at the centre of the site and to the northeast corner to a depth of 0 - 0.6m.

Under the low risk event the surface water flood maps shown no link between New Dover Road and the site. This indicates that the flooding at the centre of the site is entirely generated from within the site. The flood risk maps are based on a ground level generated from Lidar data. This data identifies the rubble spoil heaps as ground level and therefore gives an artificial ground level creating a hollow at the centre of the site which was not originally there nor would be following development.

Once the site is regraded there will not be a depression at the centre of the site and the surface water flow path will be to the northeast following the wider contours.

Positive drainage will be introduced to dispose of runoff from the development. The surface water flood modelling does not include drainage. Following development the volume of water generated from within the site that is not captured by drainage will be significantly lower than identified within the modelling.

Once the site has been reprofiled the surface water flooding at the site will be shallow. The residual risk of surface water flooding to buildings will be minimised as the finished ground floor levels will be at least 150mm above the ground level. Roads will be lower than floor levels by at least 250mm allowing for a 100mm kerb height. Roads and landscaping can be designed to maintain flow paths to the northeast under exceedance events and avoid built development. With



these measures in place the risk of flooding from surface water will be very low and not provide any restriction on the extent of development.

The sequential test does not need to be considered for the proposed development as the site lies within flood zone 1 and Capel-le-Ferne is not identified within the SFRA as an area at specific flood risk. The exception test does not need to be considered for the proposed development as the site lies within flood zone 1.

Records from a borehole sunk at Great Cauldham Farm, 1km west of the site indicate that the Clay-with-Flints Formation is approximately 9m deep and consists of clay. This is unlikely to support shallow infiltration via permeable paving or soakaways. The chalk is likely to support infiltration and therefore disposal of surface water via deep bore soakaways is considered to be the most effective surface water management strategy. Analysis indicates that it is possible to dispose of surface water runoff from the site to ground with a design that accommodates the 1 in 100 year + 45% allowance for climate change.

With a suitable surface water management strategy in place the development can minimize the onsite surface water flood risk and reduce flood risk offsite.

There are no flood risk issues identified that would restrict the quantity or type of development on the site.

## Appendix A - Surface Water Management Strategy Calculations

**Design Settings**

Rainfall Methodology	FEH-22	Minimum Velocity (m/s)	1.00
Return Period (years)	10	Connection Type	Level Soffits
Additional Flow (%)	0	Minimum Backdrop Height (m)	2.000
CV	0.750	Preferred Cover Depth (m)	1.200
Time of Entry (mins)	5.00	Include Intermediate Ground	✓
Maximum Time of Concentration (mins)	30.00	Enforce best practice design rules	✓
Maximum Rainfall (mm/hr)	500.0		

**Nodes**

Name	Area (ha)	T of E (mins)	Cover Level (m)	Diameter (mm)	Easting (m)	Northing (m)	Depth (m)
1	0.130	5.00	145.300	1200	625577.839	138745.011	1.425
2	0.130	5.00	145.500	1200	625498.016	138734.666	1.425
3	0.130	5.00	145.100	1200	625485.605	138789.752	1.425
4			145.000	1350	625529.065	138778.622	1.665
5			144.700	1350	625553.998	138813.919	3.224
5_OUT			144.600	1350	625560.113	138822.577	3.157

**Links**

Name	US Node	DS Node	Length (m)	ks (mm) / n	US IL (m)	DS IL (m)	Fall (m)	Slope (1:X)	Dia (mm)	T of C (mins)	Rain (mm/hr)
1.000	1	4	59.233	0.600	143.875	143.410	0.465	127.4	225	5.85	99.7
2.000	2	4	53.816	0.600	144.075	143.410	0.665	80.9	225	5.62	101.4
3.000	3	4	44.863	0.600	143.675	143.410	0.265	169.3	225	5.75	100.5
1.001	4	5	43.215	0.600	143.335	142.376	0.959	45.1	300	6.16	97.7
1.002	5	5_OUT	10.600	0.600	141.476	141.443	0.033	321.2	375	6.34	96.6

Name	Vel (m/s)	Cap (l/s)	Flow (l/s)	US Depth (m)	DS Depth (m)	Σ Area (ha)	Σ Add Inflow (l/s)
1.000	1.157	46.0	35.1	1.200	1.365	0.130	0.0
2.000	1.454	57.8	35.7	1.200	1.365	0.130	0.0
3.000	1.002	39.8	35.4	1.200	1.365	0.130	0.0
1.001	2.348	166.0	103.3	1.365	2.024	0.390	0.0
1.002	1.005	111.0	102.1	2.849	2.782	0.390	0.0

**Pipeline Schedule**

Link	Length (m)	Slope (1:X)	Dia (mm)	Link Type	US CL (m)	US IL (m)	US Depth (m)	DS CL (m)	DS IL (m)	DS Depth (m)
1.000	59.233	127.4	225	Circular	145.300	143.875	1.200	145.000	143.410	1.365
2.000	53.816	80.9	225	Circular	145.500	144.075	1.200	145.000	143.410	1.365
3.000	44.863	169.3	225	Circular	145.100	143.675	1.200	145.000	143.410	1.365
1.001	43.215	45.1	300	Circular	145.000	143.335	1.365	144.700	142.376	2.024

Link	US Node	Dia (mm)	Node Type	MH Type	DS Node	Dia (mm)	Node Type	MH Type
1.000	1	1200	Manhole	Adoptable	4	1350	Manhole	Adoptable
2.000	2	1200	Manhole	Adoptable	4	1350	Manhole	Adoptable
3.000	3	1200	Manhole	Adoptable	4	1350	Manhole	Adoptable
1.001	4	1350	Manhole	Adoptable	5	1350	Manhole	Adoptable




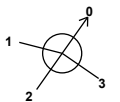


**Pipeline Schedule**

Link	Length (m)	Slope (1:X)	Dia (mm)	Link Type	US CL (m)	US IL (m)	US Depth (m)	DS CL (m)	DS IL (m)	DS Depth (m)
1.002	10.600	321.2	375	Circular	144.700	141.476	2.849	144.600	141.443	2.782

Link	US Node	Dia (mm)	Node Type	MH Type	DS Node	Dia (mm)	Node Type	MH Type
1.002	5	1350	Manhole	Adoptable	5_OUT	1350	Manhole	Adoptable

**Manhole Schedule**

Node	Easting (m)	Northing (m)	CL (m)	Depth (m)	Dia (mm)	Connections	Link	IL (m)	Dia (mm)	
1	625577.839	138745.011	145.300	1.425	1200		0	1.000	143.875	225
2	625498.016	138734.666	145.500	1.425	1200		0	2.000	144.075	225
3	625485.605	138789.752	145.100	1.425	1200		0	3.000	143.675	225
4	625529.065	138778.622	145.000	1.665	1350		1	3.000	143.410	225
							2	2.000	143.410	225
							3	1.000	143.410	225
							0	1.001	143.335	300
5	625553.998	138813.919	144.700	3.224	1350		1	1.001	142.376	300
							0	1.002	141.476	375
5_OUT	625560.113	138822.577	144.600	3.157	1350		1	1.002	141.443	375

**Simulation Settings**

Rainfall Methodology	FEH-22	Analysis Speed	Normal	Additional Storage (m <sup>3</sup> /ha)	20.0
Summer CV	0.750	Skip Steady State	x	Check Discharge Rate(s)	x
Winter CV	0.840	Drain Down Time (mins)	1440	Check Discharge Volume	x

**Storm Durations**

30	120	240	480	720	1440	2880	5760	8640
60	180	360	600	960	2160	4320	7200	10080

Return Period (years)	Climate Change (CC %)	Additional Area (A %)	Additional Flow (Q %)
2	0	0	0
30	0	0	0
100	0	0	0
100	20	0	0
100	45	0	0

**Node 5 Depth/Area Storage Structure**

Base Inf Coefficient (m/hr)	0.00000	Safety Factor	2.0	Invert Level (m)	141.476
Side Inf Coefficient (m/hr)	0.00000	Porosity	0.95	Time to half empty (mins)	1020

Depth (m)	Area (m <sup>2</sup> )	Inf Area (m <sup>2</sup> )	Depth (m)	Area (m <sup>2</sup> )	Inf Area (m <sup>2</sup> )	Depth (m)	Area (m <sup>2</sup> )	Inf Area (m <sup>2</sup> )
0.000	220.0	0.0	1.200	220.0	0.0	1.201	0.0	0.0

**Node 5 OUT Deep Bore Soakaway Storage Structure**

Base Inf Coefficient (m/hr)	0.00000	Invert Level (m)	140.100	Borehole Diameter	0.200
Side Inf Coefficient (m/hr)	0.36000	Time to half empty (mins)	47	Borehole Depth (m)	30.000
Safety Factor	2.0	Diameter (m)	1.200	Inf Depth (m)	25.500
Porosity	1.00	Depth (m)	4.000	Number Required	4

**Results for 2 year Critical Storm Duration. Lowest mass balance: 99.22%**

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m <sup>3</sup> )	Flood (m <sup>3</sup> )	Status
30 minute summer	1	18	143.969	0.093	16.6	0.2763	0.0000	OK
30 minute summer	2	18	144.158	0.083	16.6	0.2458	0.0000	OK
30 minute summer	3	18	143.777	0.102	16.6	0.3025	0.0000	OK
30 minute summer	4	18	143.449	0.114	48.9	0.1632	0.0000	OK
240 minute winter	5	192	141.678	0.202	14.6	42.4978	0.0000	OK
240 minute winter	5_OUT	192	141.678	0.235	10.2	11.2829	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m <sup>3</sup> )
30 minute summer	1	1.000	4	16.2	1.056	0.352	0.9089
30 minute summer	2	2.000	4	16.4	1.250	0.284	0.7066
30 minute summer	3	3.000	4	16.3	0.948	0.410	0.7724
30 minute summer	4	1.001	5	48.6	2.027	0.293	1.0374
240 minute winter	5	1.002	5_OUT	10.2	0.648	0.092	0.7055
240 minute winter	5_OUT	Infiltration		3.2			

**Results for 30 year Critical Storm Duration. Lowest mass balance: 99.22%**

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m <sup>3</sup> )	Flood (m <sup>3</sup> )	Status
30 minute summer	1	18	144.043	0.168	41.1	0.4978	0.0000	OK
30 minute summer	2	18	144.219	0.144	41.1	0.4246	0.0000	OK
30 minute summer	3	18	143.872	0.197	41.1	0.5809	0.0000	OK
30 minute summer	4	18	143.536	0.201	121.1	0.2871	0.0000	OK
240 minute winter	5	236	142.028	0.552	29.2	116.2007	0.0000	SURCHARGED
240 minute winter	5_OUT	236	142.028	0.585	11.3	13.3686	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m <sup>3</sup> )
30 minute summer	1	1.000	4	40.3	1.299	0.876	1.8448
30 minute summer	2	2.000	4	40.9	1.562	0.707	1.4082
30 minute summer	3	3.000	4	39.9	1.166	1.002	1.5368
30 minute summer	4	1.001	5	120.3	2.506	0.725	2.0777
240 minute winter	5	1.002	5_OUT	11.3	0.665	0.102	1.1691
240 minute winter	5_OUT	Infiltration		3.2			

**Results for 100 year Critical Storm Duration. Lowest mass balance: 99.22%**

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m <sup>3</sup> )	Flood (m <sup>3</sup> )	Status
30 minute summer	1	19	144.098	0.223	51.4	0.6587	0.0000	OK
30 minute summer	2	18	144.245	0.170	51.4	0.5037	0.0000	OK
30 minute summer	3	19	143.995	0.320	51.4	0.9460	0.0000	SURCHARGED
30 minute summer	4	19	143.571	0.236	147.3	0.3383	0.0000	OK
480 minute winter	5	456	142.221	0.745	21.6	156.6904	0.0000	SURCHARGED
480 minute winter	5_OUT	456	142.221	0.778	7.3	14.5145	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m <sup>3</sup> )
30 minute summer	1	1.000	4	48.4	1.328	1.051	2.1989
30 minute summer	2	2.000	4	51.0	1.621	0.882	1.6925
30 minute summer	3	3.000	4	48.7	1.242	1.223	1.6713
30 minute summer	4	1.001	5	147.2	2.579	0.887	2.4641
480 minute winter	5	1.002	5_OUT	7.3	0.592	0.066	1.1691
480 minute winter	5_OUT	Infiltration		3.2			



**Results for 100 year +20% CC Critical Storm Duration. Lowest mass balance: 99.22%**

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m <sup>3</sup> )	Flood (m <sup>3</sup> )	Status
30 minute summer	1	19	144.386	0.511	61.7	1.5093	0.0000	SURCHARGED
30 minute summer	2	19	144.298	0.223	61.7	0.6589	0.0000	OK
30 minute summer	3	19	144.243	0.568	61.7	1.6778	0.0000	SURCHARGED
30 minute summer	4	20	143.695	0.360	170.8	0.5147	0.0000	SURCHARGED
600 minute winter	5	570	142.440	0.964	22.2	202.7638	0.0000	SURCHARGED
600 minute winter	5_OUT	570	142.440	0.997	5.9	15.8183	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m <sup>3</sup> )
30 minute summer	1	1.000	4	54.4	1.369	1.183	2.3558
30 minute summer	2	2.000	4	60.2	1.595	1.040	2.1379
30 minute summer	3	3.000	4	56.2	1.413	1.410	1.7842
30 minute summer	4	1.001	5	165.9	2.564	1.000	3.0005
600 minute winter	5	1.002	5_OUT	5.9	0.560	0.053	1.1691
600 minute winter	5_OUT	Infiltration		3.2			

**Results for 100 year +45% CC Critical Storm Duration. Lowest mass balance: 99.22%**

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m <sup>3</sup> )	Flood (m <sup>3</sup> )	Status
30 minute summer	1	19	144.992	1.117	74.4	3.3030	0.0000	SURCHARGED
30 minute summer	2	19	144.933	0.858	74.4	2.5351	0.0000	SURCHARGED
30 minute summer	3	19	144.803	1.127	74.4	3.3328	0.0000	FLOOD RISK
30 minute summer	4	20	144.049	0.714	187.7	1.0216	0.0000	SURCHARGED
960 minute winter	5	885	143.618	2.142	19.5	253.9703	0.0000	SURCHARGED
960 minute winter	5_OUT	885	143.618	2.175	5.6	22.8383	0.0000	OK

Link Event (Upstream Depth)	US Node	Link	DS Node	Outflow (l/s)	Velocity (m/s)	Flow/Cap	Link Vol (m <sup>3</sup> )
30 minute summer	1	1.000	4	61.9	1.557	1.347	2.3558
30 minute summer	2	2.000	4	62.7	1.578	1.085	2.1403
30 minute summer	3	3.000	4	63.0	1.585	1.583	1.7842
30 minute summer	4	1.001	5	186.9	2.657	1.126	3.0413
960 minute winter	5	1.002	5_OUT	5.6	0.550	0.050	1.1691
960 minute winter	5_OUT	Infiltration		3.2			