



Response of the Bean family to Matter 3, Issue 3 (Sandwich Housing Sites) Policy SAP21 Questions 1-5 raised in the Inspectors MIQ letter dated 30th August 2023

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Q1. What is the justification for the proposed mix of uses on the site? What proportion of the site would be residential and how much land would be for the future expansion of the school?

The allocation referenced LA17 set an estimated capacity of 60 dwellings in the adopted Dover Land Allocation Plan (2015).

Both the LA17 and emerging SAP21 allocation are identical in site area and the Regulation 19 allocation reduced the housing capacity to 40 dwellings at a time when the land safeguarded for education was expected to be larger (up to 2 hectares in areas). Please refer to SoCG with DDC which updates this position and accepts there is agreement that the site capacity can be increased to 60 dwellings.

Since the Regulation 19 draft was published, discussions between Dover District Council, KCC Education and the landowner have agreed and established that a 0.8ha land area within the SAP21 for educational use (playing field, football pitch) should be provided by the allocation. This (0.8ha in area) land parcel would be transferred to the school/KCC and would comprise a strip at the western end of the allocation to facilitate the provision of additional education floorspace within the schools' existing grounds. The safeguarded land within the SAP21 allocation would allow the school to expand by 1 form entry. The expansion of the Sandwich Technology School facilitated by part of the adjoining SAP21 allocation is supported by the landowner.

The total area of the SAP21 allocation is 3.43ha in area which, following the transfer of land to Sandwich Technology School/KCC, would equate to a gross residential development area of 2.63ha. Considering the position of Sandwich in the settlement hierarchy and the other policy provisions of SAP21, including criterion a) the transition to a lower density to the Deal Road frontage; retention of hedgerow (criterion b), surface water storage (criterion e) and the early masterplanning outputs, it has been identified that the original policy expectations (set out in the Regulation 19 draft allocation) of 40 dwellings would equate to a density of only 15 dwellings per hectare. This would not represent an efficient use of the site, having regard to its sustainable credentials and proximity to the services and facilities of Sandwich and the elevated position of this settlement within the district wide settlement hierarchy. Following agreement of the educational land take, it has been agreed that a capacity of 60 dwellings is more appropriate and Dover District Council has agreed via the SoCG to support the rewording of this policy should the Inspector accept this change.

Q2. How does the proposed allocation differ from the existing development plan? What are the reasons why the existing allocation has not come forward?

The Bean family agree with the updated Indoor Sport and Leisure Facility Strategy (2022) findings which explain why the previous provisions for safeguarding of land for Sandwich Sports and Leisure Centre were no longer justified. The transfer of land from anticipated sports safeguarded land (unquantified) to the educational expansion for playing fields is one of the main policy changes together with the policy clearly quantifying the safeguarded area (0.8ha in area). If the proposed changes to housing capacity, set out in the Statement of Common Ground between the

landowner and DDC are accepted, the dwelling yield of 60, which is set out in adopted Policy LA17, will remain unchanged in Policy SAP21.

Other changes reflect the need for technical report assessments for heritage, ecology, transport and flood risk/ surface water drainage which is accepted by the landowner as necessary to support any future planning application and is consistent with many other allocations and their policy wording.

The policy amendments make clear that the transfer of the 0.8ha education land at nil cost, will be in lieu of secondary school contributions and will be secured before any planning decision can be issued via an appropriate S106 Agreement.

There are several reasons the land has not come forward following earlier allocation. These include; changes in the Bean family ownership; the complications of dealing with the Trust for Sandwich Sports and Leisure Centre and quantifying their own land take and whether the sporting need was justified and also how these facilities would be delivered and funded. These protracted discussions were delayed by COVID, when the sports centre closed and there was a change in governance and objectives of the Leisure Centre. Despite these uncertainties, the landowners reached an advance stage of negotiations with a regional housebuilder and pre-application engagement with DDC was undertaken at this time. The housebuilder was also affected by COVID and has recently gone into liquidation.

The clearer policy guidance of SAP21 and direct involvement of the landowners with KCC Education and DDC, will assist with accelerating the delivery of this site.

Q3. How and when will the proposed expansion of the school occur? Is the allocation viable and deliverable?

The landowner commits to transfer the land at nil cost as part of the Section 106 Agreement for the later planning application for residential development, which is timetabled to be submitted within 4 months of plan adoption.

With the educational land quantified in area, the transfer mechanism embedded in the policy and with the agreed housing capacity increased to 60 dwellings (equating to only 23 dwellings per hectare), it is considered the site is deliverable.

There is strong housebuilding interest within Sandwich and sales values are some of the strongest in the district. The landowners own independent viability assessment has also confirmed that the site is viable and this background has influenced negotiations with KCC and DDC on the education provision. For these reasons, the landowner is satisfied the site is viable and the development will come forward.

Q4. Can the proposed uses be achieved on the site including any necessary mitigation and other policy requirements?

Some technical work has already been undertaken on behalf of the landowner and with a clearer understanding of the educational area (reflected in the agreed SoCG), the residual 2.63 ha development site represents a housing site from which a layout

will emerge following a masterplanning process that will be informed by a number of technical studies which will also identify any necessary mitigation. It is concluded the proposed uses will be delivered on site and the SAP21 policy criteria requirements satisfied.

Q5. What is the justification of the suggested changes to Policy SAP21? Why are they necessary for soundness?

The Schedule of Additional Modifications published by DDC in March 2023 included two minor modifications relating to the frontage hedgerow for clarity, recognising that this objective should not compromise the creation of a suitable access from Deal Road.

Additional clarification was offered that if the 'educational land' were to be transferred at nil cost by the landowner, the KCC education contribution tariff (deriving from KCC Developers Contribution Guide 2023) requested by KCC at the later planning application stage, would be waived.

The landowner's acceptance of this justification is set out in the agreed SoCG with DDC.