

DOVER DISTRICT LOCAL PLAN EIP, RESPONSE TO INSPECTOR'S QUESTIONS

ISSUE 8 – KINGSDOWN HOUSING SITES

POLICY SAP34 (KIN002)– LAND AT WOODHILL FARM

SUBMITTED ON BEHALF OF KITEWOOD ESTATES LTD

COMMENT ID: SDLP766 & SDLP816

1.1 Q1 What is the capacity of the site based on? Is it justified?

1.2 The assessment of the Site capacity is not based on any known detailed assessment carried out by the Council. As set out in our Regulation 19 representations, pre-application advice has been received on proposals for 90 homes and no in principle objections were raised. A full planning application is now being developed in detail for 70 homes and is subject to further pre-application consultation with the District Council. The number of homes now proposed simply responds to a revised housing mix and is not indicative of any technical constraints. The Site is therefore still capable of accommodating 90 homes within the same developable area whilst continuing to comply with other policy considerations.

1.3 An indicative site capacity of 90 homes is therefore still considered suitable, whilst taking into account landscape considerations (as addressed further below) and making the most efficient use of this greenfield site (NPPF, para 124). The scale of development proposed is still considered to be in keeping with the settlement hierarchy, with the new development contributing to sustaining the provision of local services and facilities.

1.4 As noted in the Council's Housing Topic Paper, March 2023 (Ref: HEB05, pg 22) there are no known constraints to development and as above, it is noted that proposals for the Site have been subject to pre-application advice (at the time this would have been based on 90 homes).

1.5 The original proposed allocation of the Site (as proposed at Regulation 18) is therefore considered "Justified" and should be reflected in planning policy. Notwithstanding, a possible range could be introduced, of indicatively 70-90 homes providing further flexibility, if considered appropriate.

2.0 Q2 What effect will the allocation have on the landscape character of the area, having particular regard to views to and from the AONB?

2.1 As set out in the LVA submitted in support of the Regulation 19 representations, the Site is very much viewed within the context of existing built development and vegetation which frames and contains the Site. Other than within the immediate vicinity of the Site where only glimpsed views are experienced, no views towards the Site from within the AONB are identified. Whilst long distance views of the Site are experienced when looking towards the Site from the north and the west, it is perceived in the context of existing development.

- 2.2 The LUC Dover Landscape Character Assessment (Ref: NEEB07), identifies the Site as lying within the “Ripple” character area. With reference to the landscape and management guidelines (pg 118), the emerging proposals (which have taken a landscape led approach), would conserve the character of the landscape, keeping development close to the existing built form, contributing to maintaining a tight knit pattern of built development. It provides opportunities to improve and strengthen the quality of the existing boundaries, provide for biodiversity net gain opportunities (as set out in our Reg 19 comments) and improve the PROW network. Overall, the illustrative proposals and technical information provided demonstrates the development of the Site can positively contribute to the landscape character of the area whilst being sensitive to its position adjacent to the AONB. There is nothing in the Council’s evidence that suggests anything to the contrary.
- 2.2 It is further noted that a Landscape Sensitivity Assessment of Proposed Development Sites, Final Report, Jan 2021 (Ref: GEB11) was carried out, assessing the sensitivity of just 33 sites which the Council thought could be sensitive in landscape terms, to assist in the Council’s assessment of their suitability for development. The Site was not identified as being sensitive in this regard to warrant further assessment.
- 3.0 Q3 What is the justification for requiring the primary access to be taken from Ringwould Road? How have effects on the highways network and safety been considered?**
- 3.1 As noted in the KCC Highways response in the HELAA (Ref: GEBO9d, Appendix 3G) a suitable access is considered achievable off Ringwould Road. Discussions have continued with KCC Highways most recently in September 2023 which has further confirmed that a suitable and safe access can be achieved into the Site for all users. Criterion f) of the Policy is therefore considered to be “Justified”.
- 3.2 In respect of the wider highway network, traffic modelling has been undertaken in accordance with a scope previously agreed with KCC Highways. The traffic modelling has not indicated any issues in terms of highway network capacity or safety. As is expected, highway impacts will be considered in detail as part of the application submission and as is required by emerging Policy T12.
- 4.0 Q4 What is the justification for the suggested changes to Policy SAP34? Why are they necessary for soundness?**
- 4.1 The LVA work appended to the Regulation 19 representations does not identify the need for any advanced landscape buffering. Should advanced landscaping be required, this should be evidence based and determined through the application process. There is no evidence to support this as a blanket requirement nor that it should be provided prior to the commencement of development.
- 4.2 The comments from the AONB Unit are noted and purport that the development “could” impact on the AONB. It further seeks the provision of advanced landscaping. It is assumed that the proposed policy change is informed by these comments. There is no evidence that supports this requirement or indeed that should the development be visible from the AONB this would be intrinsically harmful to it, especially where high quality design is being promoted. As set out in our original representations,

this is a matter that remains best determined through the application process. The proposed amendment is therefore not “Justified” and thus not “Sound”.

- 4.2 No objections are raised in respect of the proposed changes to criterion g). This reflects the most recent pre-application advice from KCC Highways and KCC PROW Team (received September 2023), which seeks to maximise access to the Site by a range of modes and reflects the position that a bridleway crosses the Site. We further note that this aligns with the comments from KCC in respect of the Regulation 19 consultation.