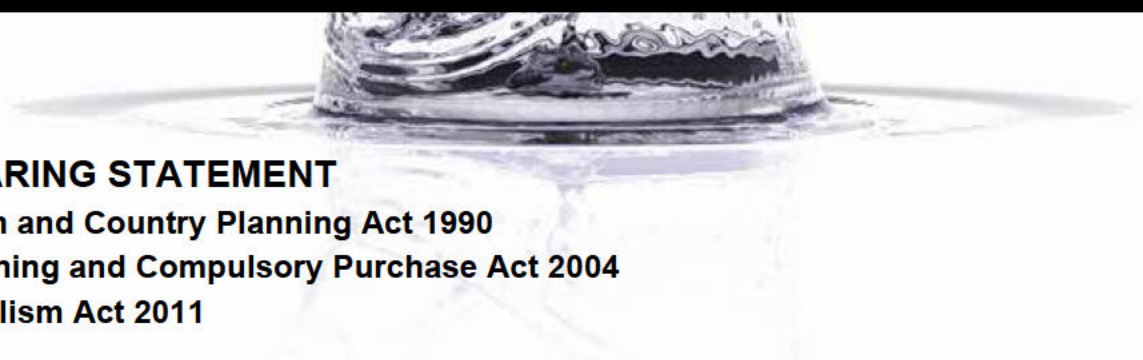


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**HEARING STATEMENT**

**Town and Country Planning Act 1990**  
**Planning and Compulsory Purchase Act 2004**  
**Localism Act 2011**

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**Matter 3 – Housing Allocations**  
**Issue 7 – St Margaret’s at Cliffe Housing Sites, Policy SAP38**  
**Reach Court Farm/Roman Way**

**On Behalf Of:**  
Reach Court Farm

**Prepared By:**  
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Job Ref: P008089

Date: 18<sup>th</sup> October 2023

## **HEARING STATEMENT**

**Matter 3 – Housing Allocations**

**Issue 7 – St Margaret’s at Cliffe Housing Sites, Policy SAP38**

**Reach Court Farm/Roman Way**

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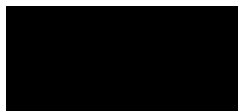
### **Main Contributors**

**Sam Silcocks, BSc (Hons) MA MRTPI**

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**Issued By**

**Signature:**



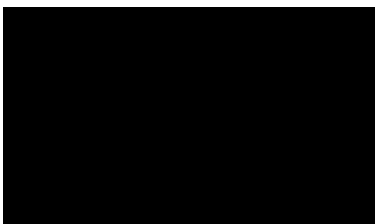
**Print Name: Sam Silcocks**

**Date: 18<sup>th</sup> October 2023**

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**Approved By**

**Signature:**



**Print Name: John Pearce**

**Date: 18<sup>th</sup> October 2023**

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- 1.0 Introduction**
  
- 2.0 Q1 Does the site allocation represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, been considered?**
  
- 3.0 Q2 What is the justification for the suggested changes to Policy SAP38? Why are they necessary for soundness?**
  
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### **APPENDICES:**

**Appendix 1 : Accessibility Appraisal**

## **1.0 Introduction**

1.1 Harris Lamb Planning Consultancy has been instructed to prepare this Hearing Statement by Owner of SAP38 in support of the proposed residential allocation of their land on Reach Road. This statement should be read in conjunction with our representations to the Regulation 19 Consultation.

1.2 In this statement we start by responding to the questions set out by the Inspectors in Matter 3, Issue 7. We then set out our response to the representations received in relation to this proposed residential allocation during the Reg 19 consultation.

**2.0 Q1 Does the site allocation represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, been considered?**

2.1 In considering whether the proposed allocation represents major development in the AoNB the NPPF tells us that this is a matter for the “decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”. In the case of this particular site is also important to remember that approximately 45% of the proposed residential allocation is not within the AoNB.

2.2 The allocation assumes 40 dwellings would be delivered on the site. If we reduce the predicted capacity by 45% to reflect the area of land outside of the AoNB, this would equate to 22 dwellings. This is a better representation of the scale of the development that is likely to be delivered in the AoNB on this site. It is our view that a development of 22 dwellings would clearly not represent major development in the AoNB.

2.3 The allocation would extend an existing residential area that forms a very stark edge to the village. This edge is clearly visible from public vantage points from within the AoNB and the prominence of these dwellings is accentuated by the large volume of white uPVC, which is not characteristic of materials used in the AoNB or Heritage Coast. The residential development of this site presents the opportunity to introduce dwellings of a more appropriate design, form and finish and to introduce a landscape belt that would filter views of the village from the surrounding AoNB. As concluded in our Reg.19 representation, the residential development would better integrate this edge of the village with the AoNB and Heritage Coast. It would secure an enhancement to their character and appearance in the regard and would certainly not have a significant adverse impact.

- 2.4 To ensure that the allocation would successfully integrate with its location adjoining the AoNB and Heritage Coast, provision is made in the emerging allocation policy in criterion a) and b) to address the design, form, materials, colour palette and heights of buildings and to ensure mature landscaping is provided. This will ensure that the proposal would better integrate this edge of the village with the surrounding countryside.

**3.0 Q2 What is the justification for the suggested changes to Policy SAP38?  
Why are they necessary for soundness?**

3.1 We have not been able to identify what the proposed changed to Policy Sap38 and so are not in a position to comment on the suggested changes at this time.

**4.0 Q3 How has the scale of development proposed been established? Is it commensurate with the role and function of St Margaret's at Cliffe as a Local Centre?**

4.1 The emerging plan seeks to distribute housing development relative to the position of the settlements within the settlement hierarchy.

4.2 St Margaret's at Cliffe is allocated 96 dwellings in Table 3.3, which is proportionate to its role as a Local Centre and Table 4.9 sets out that the four proposed allocations for St Margaret's have a predicted capacity of 96 dwellings thereby reflecting the overarching figure for St Margaret's.

4.3 Of the four proposed allocations, STM003 is the only site that is not entirely in the AoNB. Consequently, it follows that it would accommodate more development to limit the amount of development in the AoNB. The scale of development is also proportionate to the scale of the proposed allocation.

4.4 The scale of development is, therefore, commensurate with the role of St Margaret's at Cliffe as a Local Centre.



## **5.0 Comments Received to Policy SAP38 during the Reg 19 Consultation**

5.1 During the Reg 19 consultation, we note that both the St Margarets at Cliffe Parish Council and Kent Down AoNB Unit consider this allocation is Sound. This being notable as the Parish Council represents the view of the Parish as a whole and the Kent Down AoNB Unit are responsible for maintaining and promoting the vision and status of the AoNB.

5.2 The Parish Council do not elaborate on their support, but the Kent Downs AoNB Unit state:

***“As recognised in the policy, the site lies partially within the Kent Downs AONB. The site would seem an appropriate extension of the settlement, reflecting the existing settlement pattern in this part of the village and in view of its relationship with the built confines of the existing settlement is considered acceptable in AONB landscape terms.”***

5.3 Their comment on the relationship with the built confines being consistent with our representations above.

5.4 Only a small number of objections were received to the proposed allocation. These representations raised concerns with the impact of the development on the AoNB, which we have already addressed above.

5.5 The representations also raise concerns about the ability of the roads in the village to accommodate the additional dwellings and lack of services and facilities. In response to this, the owner of the site instructed Hub Transport Planning to undertake an Accessibility Assessment. The assessment is appended to this statement.

5.6 The Accessibility Assessment considers vehicular and pedestrian access to the site, local facilities, public transport, safety and traffic impact. It concludes that the site is deliverable and that the requirements of the emerging policy

could be met, which in turn supports the Council's assessment that concluded the village can accommodate the level of development proposed.

- 5.7 This Assessment also supports the Council's assessment which identified St Margarets as a Local Centre.

# **APPENDIX 1 : ACCESSIBILITY APPRAISAL**

## Technical Note

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**Project Number:** T23558

**Project:** Reach Road, St Margaret's at Cliffe

**Title:** Accessibility Appraisal

**Date:** 17/10/2023

**Prepared By:** Gerard McKinney

**Distribution List:** Project Team

4 Temple Row  
Birmingham  
B2 5HG

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### Background and Purpose of this Note

- 1.1 Hub Transport planning Ltd has been commissioned to provide advice relating to the accessibility of a proposed residential development of 40 dwellings at Reach Court Farm, St Margaret's at Cliffe. Vehicular access is to be provided from the existing farm access to a wedding venue and residential lettings, with appropriate upgrades to the access.
- 1.2 The Dover District Local Plan indicates that the site access should meet the following transport conditions:
  - *Vehicular access is to be provided from Reach Road. Trees which need to be removed to enable the access to be provided, shall be kept to the minimum needed to provide the access and any necessary visibility, and will be required to be replaced on-site;*
  - *A footway connection must be provided with the existing footway on the southern side of Reach Road;*
  - *Off-site pedestrian improvements (pram crossings) required at Roman Way, Reach Close, Royston Gardens and across Reach Road must be provided.*
- 1.3 This note has been prepared to demonstrate that the site is deliverable from a highway perspective and to demonstrate that future occupiers would have a genuine choice of other means of transport to the car to access services, facilities, and employment opportunities.

### Vehicular and Pedestrian Access

- 1.4 The site access for the proposed development will be upgraded to adoptable standards.
- 1.5 A 2m footway will be provided around the northeastern side of the upgraded site access and along the site frontage to meet the existing footway on the southeastern side of Reach Road.
- 1.6 In order to facilitate access towards the village centre for all users of the footway dropped kerb, tactile crossings will be provided at Roman Way, Reach Close, Royston Gardens and across Reach Road, with the location of the Reach Road crossing to be agreed with Dover District Council and Kent County Council.
- 1.7 Any vegetation removed to allow for footway provision and required access visibility will be minimised and suitable re-provision made on site.
- 1.8 These measures fulfil the policy requirements set out in the Dover District Local Plan and summarised above. The following sections demonstrates the accessibility of the site to local services and sustainable transport.

## Technical Note

### Local Facilities

- 1.9 The plan attached to this note as **Figure 1.1** indicates the location of facilities within St Margaret's at Cliffe and **Table 1** indicates the walk distances to those facilities.

**Table 1 – Local Facilities**

Facility	Distance from Site
Balance Spa and Health Club	480m
St Margaret's Hall	490m
St Margaret's Cosmopolitan Cricket Club	510m
St Margaret's Lawn Tennis Club	560m
The Hope Inn Bus Stop	590m
St Margaret's of Antioch Church	670m
Portal House School	720m
Red Lion and Red Lion opp. Bus Stop	850m
St Margaret's Nursery	940m
St Margaret's Bowls and Social Club	945m
Section of High Street (Incl. Public House, Post Office, Bank, Salon and Premier convenience store)	975m
St Margaret's-at-Cliffe Library	990m
Tara Surgery	1.30km

- 1.10 The local facilities search has been restricted to those facilities within St Margaret's at Cliffe, including the Tara surgery on the edge of St Margarets Bay. The facilities search indicates shops, leisure facilities, a children's nursery, places of worship, a post office, library and surgery all within a reasonable walk of the proposal site. portal House School, a school for children with special needs, is located in St Margaret's at Cliffe with primary school facilities available at Langdon Primary School and Guston C o E Primary School, both accessible by bus.
- 1.11 It is generally understood that walking and cycling provide important alternatives to the private car and should also be encouraged to form part of longer journeys via public transport. Indeed, it is noteworthy that the Institute of Highways and Transportation (IHT) has prepared several guidance documents that provide advice with respect to the provision of sustainable travel in conjunction with new developments. The suggested acceptable walking distances to common facilities are presented in **Table 2** below.

**Table 2 – Suggested Walking Distances (IHT Guidelines)**

	Town Centre (m)	Commuting/Schools/ Sightseeing (m)	Elsewhere
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

## Technical Note

- 1.12 There is also potential for short car trips to be substituted for cycle trips, and for longer trips to be substituted by a combination of cycle and public transport trips.
- 1.13 The CIHT Planning for Cycling document (2014) states that “The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles. However, the majority of trips by all modes are also short distances (67% are less than five miles, and 38% are less than two miles); therefore, the bicycle is a potential mode for many of these trips (DfT, 2014a).”

### Public Transport

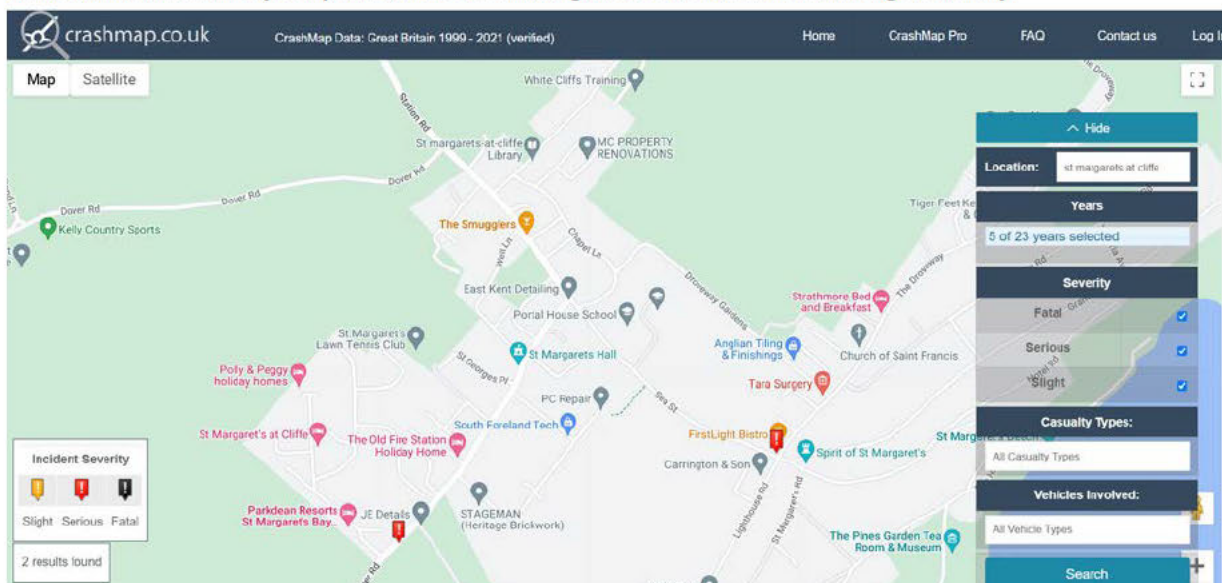
- 1.14 Details of the buses serving St Margaret’s at Cliffe have been taken from recently published online timetables are summarised in **Table 3** below. Service 93 provides a link to Dover, which can be reached for employment purposes with the first bus leaving at 07:49 and the last bus returning at 17:35.

**Table 3 – Local Bus Services**

Service Number	Route	
80B	Tower Hamlets-Dover-Guston-St Margaret’s at Cliffe-Ringwould-Walmer-Kingsdown	One each way weekdays - schooldays only
82A	St Margaret’s at Cliffe-Ringwould-Kingsdown-Walmer-Deal-Middle Deal-Upper Deal	One each way weekdays
93	Dover-Guston-East Langdon-Martin-Martin Mill-St Margaret’s at Cliffe Bay Hill-St Margaret’s at Cliffe-Ringwould-Walmer-Deal	Five services each way daily Mon-Sat

### Safety

- 1.15 The extract from Crashmap below indicates the personal injury accidents (PIAs) recorded on the highway network in a recent 5-year period across St Margaret’s at Cliffe and St Margarets Bay.



Source: Source: CrashMap.co.uk and Google Maps, 2023

## Technical Note

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- 1.16 The single incident in St Margaret's at Cliffe involved five vehicles with a single casualty. Although all PIAs are regrettable the volume of accidents recorded across the local highway network does not give any undue cause for concern.
- 1.17 Reach Road is subject to a 30mph speed limit in the vicinity of the proposal site with a vehicle actuated speed awareness sign provided close to the site access. Reach Road has streetlighting provided from a point opposite Langdon Close northwards.

### Traffic Impact

- 1.18 A residential development of 40 dwellings will typically generate about 20-24 two-way vehicle trips during a morning or evening peak hour; less than one vehicle every two minutes. The highway network along Reach Road and within St Margaret's at Cliffe operates with relatively low levels of delay and the traffic impact of such a development will be minimal in the vicinity of the site access and negligible across the network as a whole.

### Summary and Conclusion

- 1.19 Vehicular access will be from the existing, improved access to Reach Court Farm, minimising impact on vegetation in that location.
- 1.20 The proposed development will promote active travel through the provision of a footway link and new dropped crossings to assist all users of the footway network, including those with pushchairs and those in wheelchairs.
- 1.21 St Margaret's at Cliffe has a range of services typically used on a day-to-day and weekly basis by residents with a reasonable level of bus service to reach employment, shopping, leisure and education facilities and future residents are provided with a genuine choice to access a range of services, facilities, and employment opportunities by other means of transport to the car.
- 1.22 The requirements of the Local Plan policy can therefore clearly be met and the proposed development will provide safe and suitable access for all users.

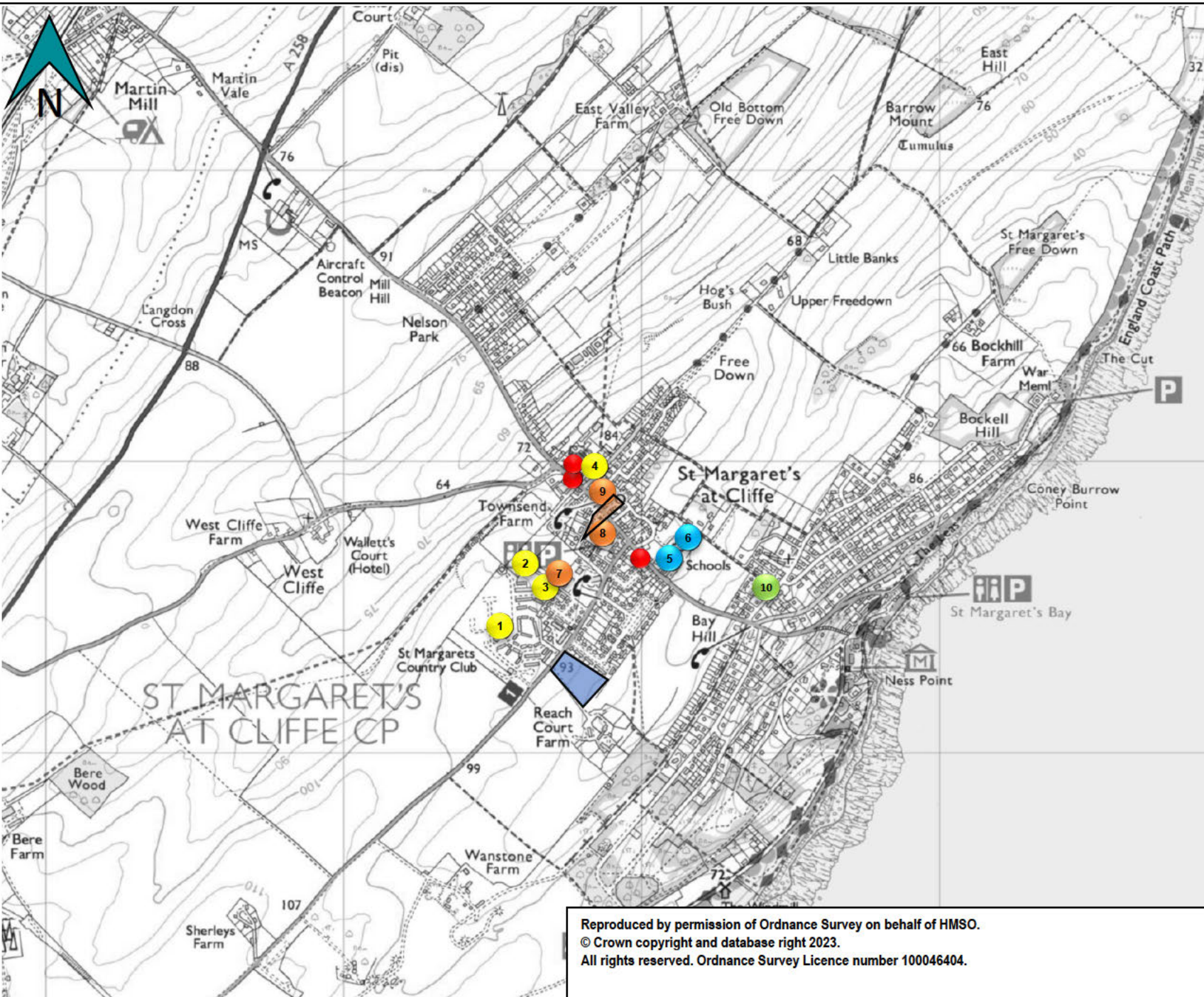
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## Figures





- Legend**
-  Site
  -  Bus Stops
  -  Section of High Street (Incl. Public House, Post Office, Bank, Salon and Premier store)
  -  1 Balance Spa and Health Club
  -  2 St Margaret's Cosmopolitan Cricket Club
  -  3 St Margaret's Tennis Club
  -  4 St Margaret's-at-Cliffe Library
  -  5 Portal House School
  -  6 St Margaret's Nursery
  -  7 St Margaret's Hall
  -  8 St Margaret's of Antioch Church
  -  9 St Margaret's Bowls and Social Club
  -  10 Tara Surgery

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Not to Scale  
 St Margaret's-at-Cliffe  
 Kent  
 Figure 1.1 – Local Facilities

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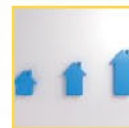
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