



Dover Local Plan Examination

Matter 3 Hearing Statements

October 2023



gladman.co.uk



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MATTER 3: HOUSING ALLOCATIONS

Issue 2: Deal Housing Sites

Policy SAP14- Land off Cross Road, Deal

Q1: What is the latest position regarding the proposals for the site?

- 1.1.1 An outline planning application (DOV/21/01822) was submitted on 02/12/2021.
- 1.1.2 The Committee Report (dated 01/08/2023) recommends the application is approved, while a resolution to grant was given by the planning committee members on 10/08/2023. The tripartite S106 Agreement (with the Council and Kent Council) has been drafted and is in the process of being agreed.
- 1.1.3 The report concludes that the 'policies in the basket of most important for the determination of this application are out of date' and therefore, the presumption in favour of sustainable development is applied. The officer determines that the benefits outweigh the limited harm of development at this location, supporting its suitability as an allocation.

Q2: How have the effects of the allocation on the landscape character of the area been considered? In allocating the site, how has the Council considered previous decisions to refuse planning and the issues it raised?

- 1.1.4 Gladman have submitted a Landscape and Visual Appraisal (LVIA) as part of the aforementioned planning application. This sets out the typography of the site and the surrounding area, the theoretical visual envelope of the site (the areas from where the site would be visible), the location of key viewpoints of the site, the sensitivity of receptors at these locations, and the consequential magnitude of the landscape effect of the development.
- 1.1.5 The LVIA concluded that the visual envelope of the site is relatively restricted as a result of the typography and development in the surrounding area. The site is also well screened by the 25 year old plantation woodland, which limits views from the southeast, east and northeast. Furthermore, additional landscaping will be delivered

as part of the development package proposed through application ref DOV/21/01822.

- 1.1.6 In closer views of the site, particularly from Cross Road, the development would be plainly visible behind a narrow strip of landscaping, which would be a marked change from the site as experienced at present. However, this is considered to be a continuation of the development along Cross Road, softened by landscaping and reflective of the development on the east of Cross Road.
- 1.1.7 Any residential development of this scale would inevitably result in some impact to the character of the area. Gladman have produced an indicative layout which retains existing landscape features and includes new landscaping features which will significantly reduce any harmful impacts. Overall, the report concluded that the visual impact of development would cause some moderate and minor adverse impacts to views in the area, and the Committee Report determined that this should carry no more than moderate weight in the planning balance.
- 1.1.8 With regard to the previous refused application (17/00505), the application related to a much larger site and was refused for five reasons, listed below with details as to how these concerns have been addressed by the current application.
- 1) The proposed residential development is outside the settlement confines, situated within the countryside and does not accord with development plan policies.
- 1.1.9 The settlement boundaries are now considered to be out of date. Allocation within the Local Plan ensures that the development is in accordance with the emerging development plan, something the Officer attributes significant weight to.
- 2) The works necessary to enable the proposed residential development of the site would by their urbanising nature, fail to protect the character and appearance of the countryside and landscape setting by causing harm to visual amenities.
- 1.1.10 The landscape impacts as previously stated, have been considered 'moderate' and the LVIA submitted as part of the application confirms that there is limited impact to the local visual amenity. This is further reduced by the submission of Reserved Matters

applications on the land East of Cross Road, which will also urbanise the immediate context of this site.

3) The application was accompanied by an insufficient levels of information to determine that opportunities have been taken to facilitate access to/from the site by sustainable transport modes, including the provision of public footpath connections; the public highway network has the capacity to accommodate the proposed increase in road traffic; and the site would be accessed by a safe a suitable form of vehicular access.

- 1.1.11 This is addressed in full in response to Q3, however, it has been determined that the development would not cause significant harm to the road network and would not cause any unacceptable impacts on highway safety and is therefore acceptable.

4) The impact of the proposed development on reptiles, which are protected by the Wildlife and Countryside Act 1981 (as amended) could not be determined due to insufficient information.

- 1.1.12 A full suite of ecological surveys has been submitted with the application, except for a specific wintering bird survey. It has been determined that whilst there is some potential for reptiles on the site, these would be limited to the arable margins of the site and the northern section of the site which will be enhanced to provide additional capacity. The application also proposed ecological enhancements and the Council's Senior Ecologist is satisfied that, subject to conditions, the development is acceptable in ecological terms. It has been agreed that the development proposal (DOV/21/01822) can deliver at least a 10% biodiversity net gain overall, when compared with the pre-development baseline.

5) The proposed application has not provided an appropriate mechanism to ensure that necessary infrastructure to support the development can be secured at the time it is needed.

- 1.1.13 Gladman will enter into a S106 agreement to ensure the delivery of the necessary infrastructure. This is in the process of being agreed with the Council and KCC, at the time of writing.

Q3: What effect will the allocation have on the safe and efficient operation of the highway network?

1.1.14 KCC as local highways authority, has agreed in consultations on application ref DOV/21/01822, that the development of the site for housing will have no unacceptable impact on the safe and efficient operation of the highway network, subject to financial contributions being made towards strategic highway improvements, as set out in the Infrastructure Delivery Plan.

Q4: How will the necessary widening of Cross Road and the provision of a pedestrian link to the station be achieved?

1.1.15 The proposed works to Cross Road, which are agreed as being acceptable by KCC, will be secured by condition, attached to any outline planning permission issued pursuant to application ref, DOV/21/01822.

1.1.16 The pedestrian link to the station will be provided through the adjoining Abbey Homes site, which is currently under construction. There is no legal impediment or restriction preventing that pedestrian connection being used by future residents of the proposed allocation on land west of Cross Road.

Q5: Is it clear to decision-makers, developers and local communities what is required to mitigate the impacts of development on drainage and surface water flooding?

1.1.17 KCC as the LLFA have been consulted on the application. It has been confirmed that the drainage approach demonstrates that surface water can be accommodated within the proposed development area. Suitable conditions will be included with the planning permission to ensure that a surface water drainage strategy is submitted for approval and that a verification report is provided prior to any occupation.

Issue 9: Housing Sites in Villages

Policy SAP46- The Steet, East Langdon

Q1: What is the justification for the scale of development proposed?

Affordable Housing

- 1.1.18 A key consideration for the scale of development in this location, rather than dispersed throughout the village on smaller sites, is the ability to deliver affordable housing.
- 1.1.19 Robustly assessing the affordability of housing within Langdon Parish is difficult due to the limited availability of data at this scale. However, assessment of the planning applications approved within the parish since 2006 confirms that no affordable housing has been delivered in East Langdon.
- 1.1.20 This is of great concern given the pressing affordability issues in East Langdon, and indeed Dover. According to HM Land Registry, since January 2018, 47 residential properties have been sold within Langdon with an average sale price of £421,627. This is significantly greater than the average UK house price of £285,000 and the average price of £394,543 in the South East of England.
- 1.1.21 In parallel, the ratio of mean house price to median gross annual workplace-based earnings which indicates the affordability of housing has worsened in Dover since 2018, as detailed in the table below.

Table 1: Ratio of median house price to median gross annual (where available) workplace-based earnings in Dover District¹

	2018	2019	2020	2021	2022
Affordability Ratio	9.37	8.21	7.12	9.25	9.57

¹ House price to workplace based earnings ratio (Table 5c): <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowequartileandmedian>

- 1.1.22 Policy SP5 as drafted determines that on schemes of 10 dwellings or more (or 6 or more in Designated Rural Areas), at least 30% of the housing provided must be affordable. The site is capable of delivering 40 dwellings, meaning that 12 of these will be affordable. The delivery of 12 much needed affordable homes of a varying mix and tenure will help to address the local housing issues in the district.
- 1.1.23 On average, the Council are delivering just 90 affordable homes per year and are yet to reach the level of affordable housing delivery required to address the pressing affordable need in the district. Rather in the first five years of the SHMA (2017) being published, a shortfall of 384 was accumulated, thus resulting in a significant backlog of need. As such, a deliverable site in a sustainable location and a suitable scale to deliver much needed affordable homes should be considered justified.
- 1.1.24 Fundamentally, the affordable housing needs across Dover District and in Langdon Parish are urgent and pressing. The provision of 30% affordable housing, a total of 12 dwellings, on Land off The Street, East Langdon will make a contribution to addressing the affordability issues in the district and parish.

Socio-Economic Considerations

- 1.1.25 The demographic of the settlement means that the delivery of a site of this scale can support the continued vitality and viability of the local population in the context of a growing population, increasing life expectancy and household formation rates.
- 1.1.26 Provision of market and affordable homes in the village will support the ongoing vitality of the community with circa 90 new residents. Of these, around 53 are expected to be of working age, 38 of whom would be in employment, increasing local expenditure and Council tax payments.
- 1.1.27 New and existing residents will benefit from development in this location, through the increase in funding for public infrastructure secured by a S106 agreement. This will include payments to education, healthcare, sports and leisure facilities, public transport, and highways infrastructure. A scheme of this scale will provide benefits

that last well into the future and provide continued support the residents of East Langdon.

Education

- 1.1.28 KCC as local education authority has confirmed through consultations on the planning application ref. DOV/23/00370 that there is surplus capacity within the school, such that all of the pupils generated by our proposed development can be accommodated (with further spare capacity).
- 1.1.29 High levels of spare capacity in schools are not good for the longevity of the school. The existing situation in East Langdon is particularly fragile as pupils travel long distances to attend the school. This is not sustainable and there is a risk of these pupils changing schools in the event of changed circumstances such as improved OFSTED ratings at their local school. The additional development will assist in supporting the school and other local facilities and supporting the long terms sustainability of the settlement.

A Sustainable Settlement

- 1.1.30 Gladman consider that the scale of development in this location is suitable due to the sustainability of East Langdon and the fact that it is not within the AONB. East Langdon is also one of the few locations that benefits from close proximity to a train station (Martin Mill), thereby justifying development of this scale at this location.

Q2: What is the justification for requiring the primary access to be taken from East Langdon Road and including a 'review' of the speed limit? How have effects on the highways network and safety been considered and is it sufficiently clear what is required from the users of the Plan?

- 1.1.31 Gladman have undertaken a Transport Assessment which was submitted with planning application DOV/23/00370. This has considered the effects of development at this location on the highways network.
- 1.1.32 The access is proposed via the creation of a priority-controlled junction off the Street. The land required for the vehicular access is controlled by Gladman or is adopted

highway. As per the Kent Design - A Guide to Sustainable Development, a development with a maximum of 50 dwellings can be served from a Minor Access Road. The access point is therefore suitable and justified. Access from this location also allows the continuation of linear development and street frontage along The Street, in keeping with the character of the local area.

1.1.33 The Site Access Plan submitted with the application illustrates a number of different access scenarios for various size vehicles and established the best location for access for the proposed development.

1.1.34 Gladman are working with the Council and KCC to resolve the outstanding concerns.

Q3: What is the latest position regarding proposals for the site?

1.1.35 Gladman submitted planning application DOV/23/00370 on 09/03/2023 and this was validated on 10/03/2023.

1.1.36 A full suite of technical reports has been submitted and there are no statutory objections, bar one (which Gladman are working with KCC to resolve) demonstrating the suitability of the site.

Q4: What is the justification for the suggested changes to Policy SAP46?

1.1.37 The suggested changes to Policy SAP46 (at modification references AM75 and AM76) are generally supported by Gladman. At AM67 however, Gladman considers that the text reading '(along the street)' should be deleted from the proposed insertion to policy criterion (d). The reason for this is that, as per discussions with KCC on the current live application (Ref. 23/00370), the opportunities to deliver footpath and pedestrian improvements on The Street are limited; and, that improved pedestrian and cycle connections between the site, the school and the recreation ground are most appropriately secured through the development site (and by upgrading PROW ER44) rather than upgrading The Street itself. In this context, the wording 'along the street' should be removed for clarity.

1.1.38 Gladman have also previously submitted an alteration to the wording as drafted. Gladman would advise that the wording of Policy SAP46 is altered from '*Development*

proposals for the site shall include the following: to *'Development proposals for the site shall be supported when in broad accordance with the following:'* This will ensure that any deviations to the policy requirements following detailed technical works do not jeopardise the site's ability to come forward. This allows for a suitable degree of flexibility to respond to anything raised by technical consultees and more detailed design considerations.