

DOVER DISTRICT COUNCIL LOCAL PLAN EXAMINATION

INSPECTORS' MATTERS, ISSUES AND QUESTIONS PUBLISHED 30TH AUGUST 2023

STATEMENT ON BEHALF OF GSE PROPERTY GROUP LTD

RESPONSE TO THE INSPECTORS' MATTERS, ISSUES AND QUESTIONS IN RESPECT
OF ISSUE 2 – DEAL HOUSING SITES, POLICY SAP15 – LAND AT RAYS BOTTOM.

Lee Evans Planning Ref: 9265

October 2023



REPRESENTATIONS ON BEHALF OF GSE PROPERTY GROUP LTD

IN RELATION TO

LAND AT RAYS BOTTOM, WALMER

Client	<i>GSE Property Group Ltd</i>
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Date	<i>October 2023</i>
Status	Submission Version

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I. INTRODUCTION

- I.1 This statement has been prepared on behalf of our clients, GSE Property Group Ltd, in response to the Inspectors' Matters, Issues and Questions, published on 30th August 2023 and draws upon the Evidence Base Documents published or made available following the close of the public consultation on the Draft Plan in December 2022.
- I.2 The responses are made on behalf of GSE Property Group, who are acting as a promoter on behalf of the Land Owner. A submission of representations to the Regulation 19 Local Plan Consultation was made on behalf of the landowner by DHA, acting on behalf of Fernham Homes, however we can now confirm that GSE Property Group are the promoter working on behalf of the landowner.
- I.3 GSE Property Group are a family-run, Kent based business with an abundance of experience in the development and construction industry. Lee Evans Partnership is working with GSE on behalf of the landowner, to provide planning and architectural services, with the aim of submitting an Outline Planning Application in Summer 2024.
- I.4 Matter 3 of the Inspectors' MIQs relates to Housing Allocations and Issue 2 sets out a number of questions in relation to Deal Housing Sites including questions for Policy SAPI5 – Land at Rays Bottom.
- I.5 For context, Policy SAPI5 is a Draft Allocation Policy for Land at Rays Bottom, and proposes to allocate the site for a residential development, setting out that the site has an indicative capacity of 75 dwellings.
- I.6 In total, The Inspectors asked 6 questions under Issue 2 – Deal Housing Sites, and they are as follows:

Q1 How have the effects of the allocation on the landscape character of the area been considered, having particular regard to the topography of area and the density of surrounding residential development?

Q2 What effect will the allocation have on the safe and efficient operation of the highway network, having particular regard to the width of Liverpool Road and the opportunities available to provide pedestrian and cycle connections?

Q3 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?

Q4 How have the effects of development on the setting of heritage assets such as the Grade II Registered Park and Garden of Walmer Castle, and the significance of heritage assets of archaeological potential been considered? Can a suitable scheme be achieved on this site whilst maintaining the significance of these heritage assets?

Q5 What effect will development of the site have on the adjacent national priority Broadleaved woodland habitat and nearby Kingsdown and Walmer beach local wildlife site?

Q6 What is the justification for the suggested changes to Policy SAPI4? Why is this necessary for soundness?

I.7 Responses to each question are set out in the following section.

2. RESPONSE TO INSPECTORS' QUESTIONS

Q1: How have the effects of the allocation on the landscape character of the area been considered, having particular regard to the topography of area and the density of surrounding residential development?

2.1 It is submitted that the effects of the allocation on the landscape character have been considered by DDC adequately and at the earliest opportunity. Appendix 3 to the HELAA sets out the Landscape Comments of Dover District Council. In regards to SAPI5 (then listed as WAL002), this document sets out the following:

“The site itself rises from Liverpool Road in the east to the residential properties at Hawksdown to the west. Tree line boundary to the west. There is no natural boundary to the south and the land continues as agricultural fields. Small scrubland area provides separation between the agricultural field and residential properties to the north. Site is open in nature with a ditch providing the only along Liverpool Road. Site is opposite to an area of protected open space (Hawks Hill) and an area of Priority habitat. Site is open in nature. The site is relatively discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate as views in are limited and the flow of housing down the slope would not detract. The impact of development on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary.”

2.2 The site is located at the base and partially along the side of the Rays Bottom valley and is tucked out of sight, being located between two areas of residential development. To the north, the site borders an area of dense woodland, similarly to the east of the site, the dense tree planting along the bank which rises to towards the coast, screens the site from wider views.

2.3 The HELAA assessments sets out that “... the sensitivity of the site is moderate as views in are limited, and the flow of housing down the slope would not detract. The impact of development on the wider landscape and this could be reduced further by providing additional buffer of landscaping along the southern boundary.” GSE are willing and able to specify that an additional landscape buffer along the southern boundary is provided and forms a key element of the design of any forthcoming planning application.

2.4 Further consideration of protecting the landscape character has been given within the Draft Allocation Policy SAPI5. Criteria A sets out that ‘Development should be low density and

sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape.’ Criteria B sets out that ‘A sensitive landscaping scheme and appropriate landscape buffer to the south, determined by a Landscape Visual Impact Assessment is required to mitigate the impact of development on the wider countryside and to provide opportunities for biodiversity habitat creation and enhancement responding to the nearby BOA and Local Wildlife Site.’ Arguably, without these criteria being fulfilled, a planning application would not be successful.

- 2.5 We submit that the Council have adequately considered the effects of the proposed allocation on the surrounding landscape, and further consideration will be required in the form of a detailed landscape scheme including a landscape buffer (to be determined by a LVIA), along with a sensitive design which respects the character of the area. We consider that the appropriate route to secure this mitigation is through the development management process with the submission of a planning application.
- 2.6 In preparing this statement, we have reviewed the Council’s Evidence Base documents including the ‘Landscape Character Assessment 2020’ and the ‘Landscape Sensitivity Assessment 2021’. Neither document references the proposed allocation site of Land at Rays Bottom SAPI5, or discusses this part of the district in detail. We consider that the site is not within an area of high landscape sensitivity, and that any impacts from the development on the wider landscape setting, could be adequately mitigated through a sensitively designed landscape scheme, which would be required as part of any forthcoming planning application.
- 2.7 In terms of surrounding densities, land immediately adjacent to the site is built out at a very low density of approximately 6 dwellings per hectare. These houses are large, detached units set on generous plots, with houses in the Hawksdown area typically selling for £750,000 - £900,000. Moving away from the immediate vicinity of the site, and moving closer to Walmer and Deal, housing densities increase to a typical suburban pattern, with many pairs of semi-detached units, terraces of town houses, some bungalows and some detached units present.
- 2.8 It is also important to note that land off of Dover Road, to the south-west of the site, has recently achieved planning permission for the erection of 85 dwellings with a density of 33 dwellings per hectare (excluding the largest areas of retained green infrastructure) (please see Planning Applications DOV/17/00487 and DOV/21/00255). Whilst adopted Core Strategy Policy CP4 encouraged higher densities of development (40 dph and above), the Outline Permission for this Dover Road site limited the number of dwellings up to 85 and as such, a greater density was not

possible. Arguably, the Dover Road site is in a more prominent position than the Rays Bottom site and it is more readily visible from the wider landscape, being sited on the brow of a hill. The development of the Dover Road site is underway, and as such it is anticipated that this site will form the surrounding character at the time of any planning application on the Rays Bottom site, forming a consideration in any layout design.

- 2.9 Lee Evans Partnership have prepared a masterplan to demonstrate that the proposed allocation of 75 dwellings can be accommodated on the site, whilst respecting the topography, minimising cut and fill, and providing a low-density form of residential development (please see Appendix I). Excluding the area of dense woodland at the north of the site, which is to be retained, the site has an approximate area of 3.9ha. Delivering 75 dwellings on the remaining land would achieve a density of approximately 19 dwellings per hectare. This is significantly lower than that approved on the Dover Road site, just 400m to the south-west of Rays Bottom.
- 2.10 Criteria A of Policy SAPI5 requires that development proposals should be low density and sensitively designed to respect the existing character of the area, the topography of the site and to allow transition to the rural landscape. It is noted that delivering 75 dwellings across this site would result in a higher density than the immediate surroundings of Hawksdown, however a density of 19 dwellings per hectare is generally considered to be low density development, and in line with Criteria A, would respect the existing character of the area and provide a transition to the rural landscape.
- 2.11 The National Planning Policy Framework (NPPF) encourages planning policies and decisions to support development that makes efficient use of land (paragraph 124) and sets out that plans should contain policies to optimise the use of land in their area and should include the use of minimum density standards that seek a significant uplift in the average density of residential development, unless it can be shown that there are strong reasons why this would be inappropriate.
- 2.12 We consider Policy PMI of Dover's Draft Local Plan is consistent with the aims of the NPPF in this regard, as the Policy sets out at Paragraph 2.b that development must *"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"*.

- 2.13 In relation to the Rays Bottom Site, the proposed allocation would result in a density of approximately 19 dwellings per hectare, which Policy PMI justifies since the site is located on the edge of the Walmer settlement.
- 2.14 Dover District Council's Examination Document 3, 'Selection of Site Allocations Housing Sites Addendum April 2023' discusses the reasons for the proposed allocation. The document sets out that the site is considered to be suitable for allocation within the Local Plan owing to its 'sustainable location and access to services within the upper Walmer Area.' Further, the assessment notes that whilst the site is greenfield and in close proximity to some ecological constraints, the constraints are not significant and impacts can be mitigation. Additionally, it was considered that the development of this site would 'form a natural extension to the residential built area and fill a 'gap' in the current built form in this location.' We fully support this assessment and agree that the site would appear as infill, and development would be located with existing built development as its backdrop.
- 2.15 We submit that the Council have adequately considered the effect of the allocation on the landscape character, particularly in regards to the site's topography and density of surrounding residential development, and have appropriately balanced the need for additional houses against the ecological and heritage constraints and landscape setting to present the site for allocation with an indicative capacity of 75 dwellings.

Q2: What effect will the allocation have on the safe and efficient operation of the highway network, having particular regard to the width of Liverpool Road and the opportunities available to provide pedestrian and cycle connections?

- 2.16 The proposed allocation site, once developed, could deliver 75 dwellings, ranging from two to five-bedroom homes. As a result, this will place an additional demand on the local highway network, specifically Liverpool Road and its junction with Gram's Road. It is considered that the local highway network can, however, accommodate this additional demand subject to alterations to Liverpool Road which will create a safer road environment for all users.
- 2.17 Liverpool Road is a single lane carriageway with multiple passing points adjacent to the site and towards Gram's Road. It has a low accident rate record but is a well-used route between the south of Walmer and Kingsdown.

- 2.18 An indicative layout has been produced (see Appendix 1), which shows a new vehicular and pedestrian access off Liverpool Road. The provision of a single access/egress point for the development is considered sufficient for the number of dwellings envisaged, though additional points of entry could be investigated, in conjunction with KCC Highways, at planning application stage, if it was deemed to be a potential benefit.
- 2.19 To support representations made at Regulation 19 Consultation Stage, the landowner prepared a Preliminary Highways Works Plan (see Appendix 2). The plan shows highway improvements, including the provision of road centre lines at the junction with Gram's Road and the proposed access to the site, and formalised (by means of kerbing) vehicular passing points. These will provide a minimum road width of 4.8m and will improve upon current highway safety and provide clarity to drivers over rights of way and use of the highway when entering and exiting Gram's Road and the site. The proposed site access is also shown to achieve Kent standards visibility splays in both directions (2.4m x 59m).
- 2.20 The indicative highway works also show the introduction of a speed limit (30mph) approximately 120m south of the access to the site. This measure is included in draft Policy SAPI5 and is considered appropriate in further improving highway safety above the current status.
- 2.21 The plan shows the alignment of, and ability to provide, a footway (measuring between 1.2m and 1.8m in width), extending north along Liverpool Road, culminating in a crossing point to connect to the existing footway on Gram's Road. The footpath will initially be provided on land within the site boundary, including land on the periphery of the 'retained woodland', beyond which it will utilise highway land. Where the footpath enters the woodland, it will be aligned to protect arboricultural interests, including (if necessary), shallow foundation construction that allows for root retention and growth. In the unlikely event that tree removal is necessary, this will provide the opportunity to deliver net improvements through the planting of semi-mature, species appropriate tree planting in numbers exceeding any loss.
- 2.22 This section of Liverpool Road is a typical unclassified rural lane with formal and informal passing places. It operates under an unlit derestricted 60mph speed limit. To facilitate any sort of residential development to the site, this section of Liverpool Road would need to be improved in line with the Kent Design Guide for the proposed development and the existing traffic using Liverpool Road. This would consist of :

- A) Extending the existing 30mph speed limit south of the Gram's Road junction to beyond the proposed site's vehicular access.
- B) Utilising the apparent highway land along its length, the carriageway could be widened to enable mostly 2-way vehicle flows and include a continuous footway link between the site and the existing footway on Gram's Road.

2.23 Due to apparent land constraints, a length of single lane width carriageway must be retained but is within maximum passing place distance criteria in the Kent Design Guide. This narrow section of highway could act as a speed restraint feature.

2.24 These overall improvements could allow safe vehicle, cyclist and pedestrian access to/from the site from the Gram's Road/Liverpool Road junction.

2.25 The site promoter commits to working collaboratively with KCC Highways to deliver the necessary highway improvements deemed necessary to provide safe driver and pedestrian connectivity. The detail of the measures and works required can be finalised at planning application stage, and ensured by way of S278 works, which again, the site promoter/applicant commits to.

2.26 In addition to proposed highway works, it should be noted that a secondary pedestrian route currently exists across land in the same ownership as the draft allocation site. As shown in the image below, public right of way ER1 and ER3 connect Liverpool Road/Glen Road to Dover Road to the west. Dover Road is a main transport route with a public footpath along its length and bus stops with regular services.

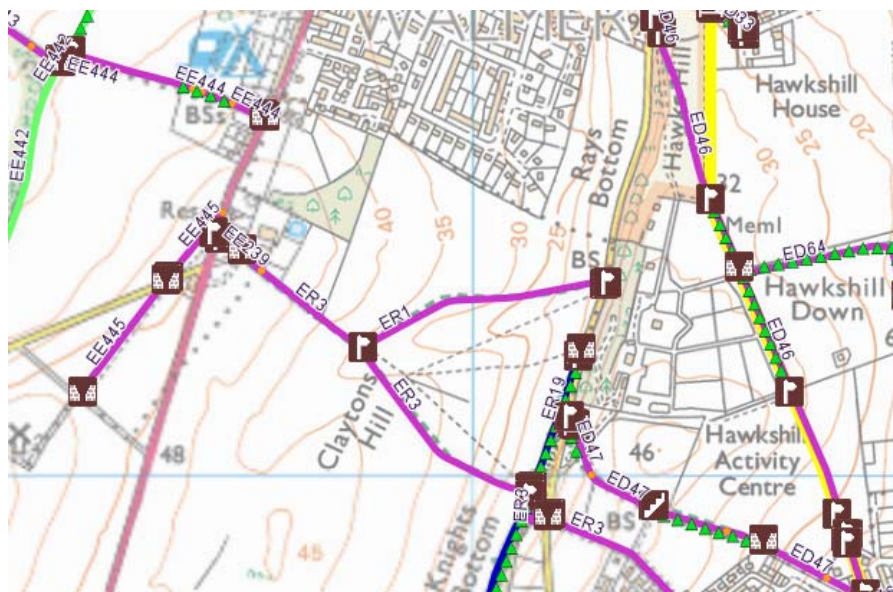


Fig 1. Extract from KCC Public Rights of Way Map

Q3: 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?

2.27 GSE Property Group have provided a Technical Note to respond to this question and should be read alongside this statement (please see Appendix 3).

2.28 The Technical Note sets out that during GSE's early inspections it was noted that the topography of this site presents an opportunity for water to naturally fall into the existing drainage system. Several markers (i.e. manhole covers and drains) along Liverpool Road were noted which indicate the approximate position of the existing drainage network. Based on their inspection, they have assumed this network is suitable for the proposed drainage strategy, although confirmation on whether this is a combined sewer system or an individual foul water / surface water system will be sought through the pre-application discussions with the Environment Agency and Lead Local Flood Authority (LLFA).

2.29 The Technical Note sets out that

“Through a topographical survey and confirmation of levels, our proposed strategy would be to drain towards the “bottom” of the site (being Liverpool Road) and into the existing network. Works would coincide with the proposed roadworks. The precise capacity of the network and subsequent flow rates would be confirmed by the water body.

Flows from the site can be controlled by way of attenuating the storm water with a crated system or increasing capacity within the new proposed drainage network. This could also be restricted at point of discharge should there be an issue with flows rates by way of introducing hydro brakes or similar flow control devices.

SuDS areas could be introduced through design which would be the most beneficial way to manage rain close to where it falls, predominantly on (or close to) the surface (which often includes vegetation). Examples of this would include rain gardens, tree pits, swales and small wetland areas. All of these green features act as a “sponge” to absorb rainwater.

Surface water can also be controlled with porous paving areas that would include baffles to assist with slower discharges into the drainage network. Obviously, the precise strategy needs further investigation but in our opinion the site does not require too much cut and fill to make the drainage work and we would be advising we work from as near to the current levels as possible.”

2.30 The Technical Note confirms that GSE are aware of the work required to mitigate the impacts of development on drainage and surface water flooding, and have gone so far as to prepare a strategy based on an indicative masterplan (see Appendix I). The strategy to deal with drainage and surface water flooding would be to use the topography of the site to naturally drain towards the existing drainage network, rather than requiring any new pumping station, whilst having mechanisms in place to control the flow rate and subsequently mitigate the impacts of this development on surface water flooding and the drainage network.

Q4: How have the effects of development on the setting of heritage assets such as the Grade II Registered Park and Garden of Walmer Castle, and the significance of heritage assets of archaeological potential been considered? Can a suitable scheme be achieved on this site whilst maintaining the significance of these heritage assets?

2.31 Lee Evans Partnership's Accredited Specialist Conservation Architect, Nick Lee Evans, has provided an initial, Desk Based Heritage Assessment to support this statement. The Heritage Assessment is provided at Appendix 4 and should be read alongside this statement.

2.32 It is submitted that the known built heritage assets relating to the site are the Walmer Castle Scheduled Historic Monument and the Grade II Registered Park and Garden of Walmer Castle, both of which are to the north-east of the site. Additionally, the site falls within an Area of Archaeological Potential.

2.33 The site itself is situated within the valley known as 'Rays Bottom', running parallel to Liverpool Road. To the east and north of the site, a dense woodland strip conceals the site from the adjacent fields and the heavily wooded boundary of Walmer Castle Gardens. The topography of this area is such that the land rises both to the west and east of Liverpool Road, with Walmer Castle Gardens being some 10m above the lowest ground level of the proposed allocation site SAPI5, Walmer Castle itself is then some 10m below this ridge, which allows the castle to be concealed from wider views towards the west.

2.34 This intervening landscape with dense woodland and varying topography in addition to the secluded nature of the castle and its grounds, means that the castle and gardens are not visible from the proposed allocation site and similarly, the proposed allocation site is not visible from within the castle grounds or the registered park and garden. It is therefore submitted that a development of the site would preserve the setting of both Walmer Castle and the Registered Park and Garden.

- 2.35 In terms of archaeology, an excavation took place between 2004 and 2005 some 400m to the west of the site, and discovered evidence of prehistoric and Romano-British activity as well as small finds relating to late Bronze Age and middle Iron Age (TR 34 NE 258) and a 2nd or 3rd century aisled building was found. There is a suspected site of a Roman Villa in the vicinity of Thistledown. All around the site there are remnants of WWII defences in adjacent fields but none identified in the development site probably because it is in a hidden valley without coastal views. The first edition of the Ordnance Survey around 1874 indicate no built features on the site and it is suspected the land has been continuously farmed for many centuries. Crop marks were identified in 1976, and as such, it is considered likely that an archaeological investigation, possibly involving trial trenches, will be a necessary component of the planning process and will be undertaken at the earliest opportunity. The investigations can be secured through the development management process to ensure development preserves or adequately records any below ground assets.
- 2.36 The National Planning Policy Framework (NPPF) underscores the significance of Heritage Assets, including Listed Buildings and Historic Parks and Gardens, and emphasises the need to evaluate any potential impact on the setting of scheduled heritage assets within the planning process. A full Heritage Assessment will be carried out to support a planning application, and on-site archaeological investigations can be carried out, should they be required, through the application process.
- 2.37 It is therefore considered that historic environment, including both built assets and those unknown below ground assets, can be adequately preserved, and harm to them limited through sensitive design, on site investigations and additional boundary planting if necessary.

Q5 What effect will development of the site have on the adjacent national priority broadleaved woodland habitat and nearby Kingsdown and Walmer beach local wildlife site?

- 2.38 The site promoter is fully supportive of national government and local authority objectives for the protection and enhancement of the natural environment and in particular those assets that warrant special protection such as woodland and beaches. In this instance the broadleaved woodland habitat and the Kingsdown and Walmer beach wildlife sites provide locally important habitat areas that warrant protection and management to ensure their current status is retained over the course of the new Local Plan.
- 2.39 It is similarly important that Dover District Council identify sufficient land to facilitate the delivery 10,998 houses over the remaining Plan period (to 2040) in order to address the current and future

housing need of the District. However, this housing delivery must be implemented so as to complement, and if possible, enhance, those protected areas of wildlife importance.

- 2.40 The proposed allocation at Rays Bottom, Walmer, will assist with responding to housing need by delivery in the region of 75 dwellings in a sustainable location. It is one of a number of similarly sized allocations, which when combined, make up a significant proportion of the identified housing need. It is submitted that medium sized allocations such as this are able to more effectively mitigate and manage potential impacts upon wildlife assets than larger allocations by virtue of the lesser and more localised population spike and the more manageable mitigation measures that would be required.
- 2.41 For example, it is anticipated that local utilities and infrastructure capacity will be sufficient for the addition of circa 75 new dwellings, or could be adapted to be so. The development would be required, at planning application stage, to identify means of effective drainage (so as not to increase surface water outflow from the site), and to reduce air, noise and light pollution upon the surrounding area (thereby ensuring those local wildlife sites are not unduly impacted). The site promoter is committed to undertaking the necessary investigations and surveys at planning application stage to fully understand the potential for impacts, and identify means of firstly reducing any such impact, and secondly mitigating any impact in the interests of wildlife protection. The protection, mitigation and enhancement can be secured through the development management process and via a planning application.
- 2.42 Furthermore, the site promoter anticipates the need to undertake an assessment of potential impacts of the development, and in particular its residents, upon the broadleaved woodland and Kingsdown and Walmer beach. Existing Walmer residents utilise local public footpaths to access the surrounding countryside and beach for pleasure purposes and a proportion of the residents from the new development would likely do the same. It is common practice to mitigate any such impacts by way of a financial contribution, which would be used by the local authority and/or managing body of protected sites, to manage those resources and mitigate anticipated recreational impacts. The funding can also be used towards improving awareness of visitors and towards habitat and/or wildlife enhancements. In this way the development of the allocated site could deliver improvements that otherwise remain beyond current funding streams.
- 2.43 As set out in DDC's Document 'ED3 Selection of Site Allocations Housing Sites Addendum April 2023', whilst the site is located in close proximity to some ecological constraints, the constraints are not significant in that it is considered that any impacts can be mitigated through design and

layout of a scheme, through a planning application. We consider that the appropriate place to secure mitigation and enhancement to the areas of ecological interest, is through the development management process by way of suitable planning condition or obligation.

- 2.44 The site itself, excluding the area of Broadleaved Woodland, which is listed as a Biodiversity Opportunity Area, is of little to no ecological value, having been intensively farmed. The development of this site would bring with it the opportunity to create new habitats, provide on-site biodiversity net gain and protect and enhance the adjacent woodland with new planting and appropriate management, as well as fund the protection, management and enhancement of the nearby Walmer Beach Local Wildlife Site.

Q6: What is the justification for the suggested changes to Policy SAPI4? Why is this necessary for soundness?

- 2.45 Please note, this response has been answered in relation to SAPI5 as it was considered that there was an administrative error in the question which identified SAPI4.
- 2.46 Initially, the site was identified to have an indicative capacity of 100 dwellings, however this was reduced for the publication of the Regulation 19 Local Plan to 75 dwellings. The reason for the change, given in the DDC Document *'The Selection of Site Allocations for the Regulation 19 Submission Local Plan September 2022'*, was *'to enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided'*.
- 2.47 Reducing the capacity of the site is considered to be reasonable, given the imminent adoption of Biodiversity Net Gain (BNG) through the Environment Act, it is likely that any developer will need to reserve a significant portion of the site if they wish to deliver on site BNG. Additionally, in order to mitigate any landscape impact, a new landscape buffer will be required along the southern boundary of the site, removing a significant parcel of developable land.
- 2.48 Delivering 75 dwellings on the site would result in a development of approximately 19 dwellings per hectare, which is considered to be a low density and would be in keeping with its surroundings.
- 2.49 Whilst GSE support the changes to the allocation, it is considered that the justification for them will fall with the Local Planning Authority.

3. SUMMARY AND CONCLUSIONS

- 3.1 On behalf of GSE Property Group, this statement is made to respond to and clarify matters raised in the Inspectors' 'Matters, Issues and Questions' published 30th August 2023. GSE, working on behalf of the landowner, are in full support of the proposed allocation, and consider the site to be deliverable, with the indicative capacity of 75 dwellings to be achievable.
- 3.2 It is widely recognised throughout Kent that the focus for identifying new residential development sites should be where they are most sustainable, this usually means locating new development within or adjacent to existing settlements. The site is located on the edge of the Walmer Settlement, and offers a sustainable form of development, being well located in relation to a wide range of services within Walmer and Deal area. The local area also offers numerous community facilities, services and employment within accessible distances of the site.
- 3.3 The character and setting of the urban area and rural area beyond and the transition between them could be enhanced by the provision of a high quality but well landscaped new development with the provision of a strong landscape buffer.
- 3.4 We consider that the Council, in allocating the site for residential development, have adequately considered the impact of the allocation on the surrounding landscape, ecology and heritage. Additionally, we consider that both the Council and developers are aware of the work required to adequately mitigate the effects of the development on flooding and drainage, and that improvements can be made to the local highway network to ensure a safe road environment for all users, particularly improving pedestrian connectivity.
- 3.5 We look forward to attending the hearing later this year and would be pleased to provide any further information on the above as necessary.

Appendix I: Indicative Masterplan



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DOCUMENT REVISION :A

ISSUE DATE : 19/04/2023

00006_WALMER LIVERPOOL ROAD_FEASIBILITY STUDY_LEE EVANS PARTNERSHIP

NOTE:

High level sketch proposal is subject to further survey information and site analysis.

Site Entrance follows previous studies and transport analysis done by others.

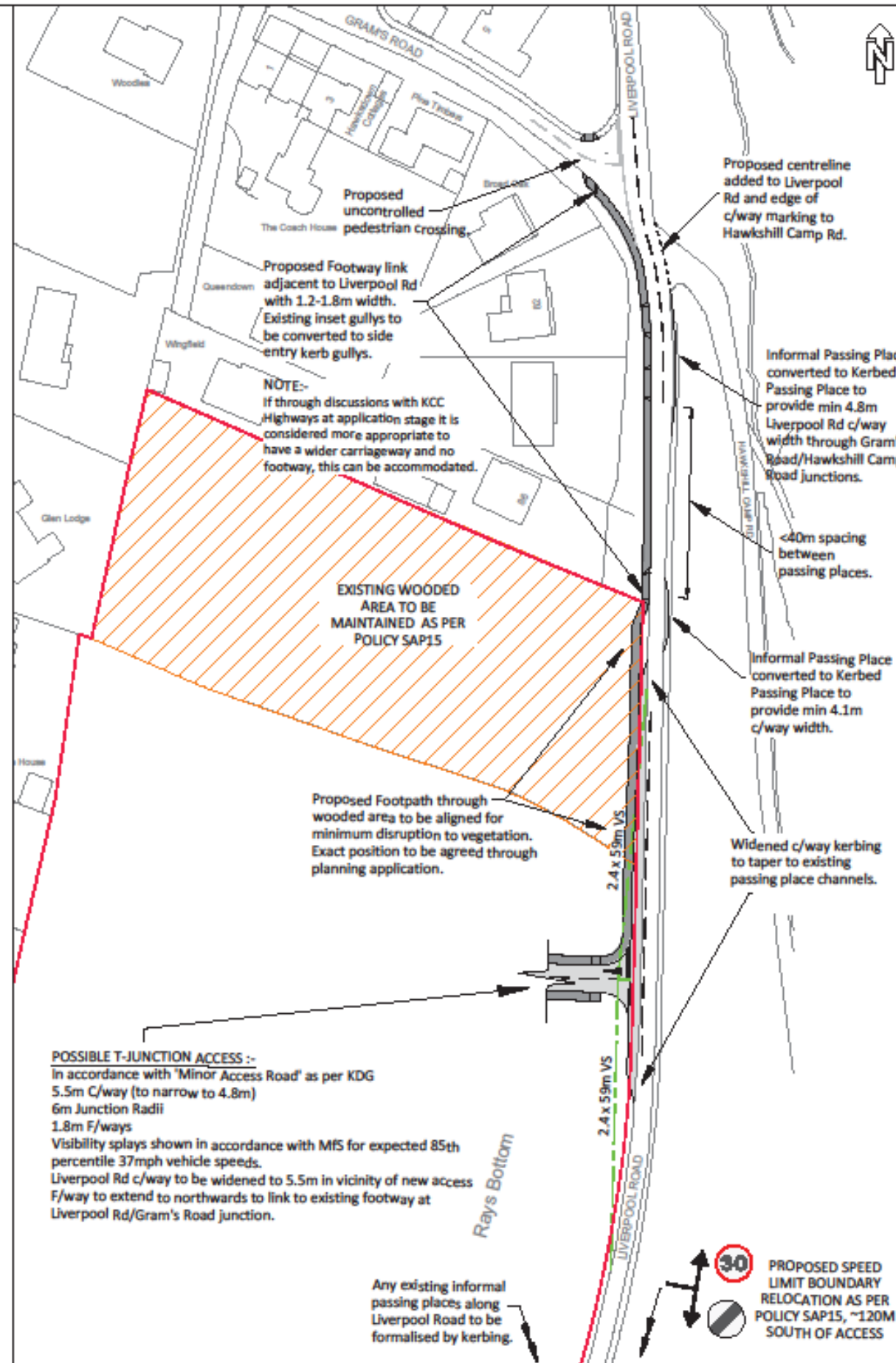
Indicative Dashed Line to show change in levels. Existing Site Levels will need to be further investigated and considered in later design stages.

Appendix 2: Preliminary Highway Works Plan



EXISTING SITE LAYOUT & ADJACENT HIGHWAY NETWORK

1:500@A1



POSSIBLE T-JUNCTION ACCESS & HIGHWAY WORKS TO LIVERPOOL ROAD TO SERVE RESIDENTIAL DEVELOPMENT

1:500@A1

DO NOT SCALE THIS DRAWING. ALL SETTING OUT TO ARCHITECT'S DETAILS AND DRAWINGS
 THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWING ISSUES AND THE SPECIFICATION.



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 WITH VIEWPORT IN CHAIN
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FOR: FERNHAM HOMES

LAND AT RAYS BOTTOM BETWEEN LIVERPOOL ROAD & HAWKSDOWN WALTER, KENT (WAL002)

PROPOSING THE POSSIBLE SITE ACCESS & HIGHWAY WORKS TO SERVE RESIDENTIAL DEVELOPMENT

Drawing No: 5475-CON-00-XX-DR-T-1900
 Date: 06/03/22
 Author: A. Stone
 Checker: A. Stone

Scale: 50 SUITABLE FOR INFORMATION
 P01 PRELIMINARY



Appendix 3: GSE Technical Note on Drainage

GSE House, Paper Lane,
Willesborough, Ashford TN24 0TS
T: 01233 501 301 gse-group.com

**GSE BUILDING & CIVIL
ENGINEERING LTD.**
GSE PLANT LTD.
GSE C&H HOLDINGS LTD.



FAO Nathan Anthony
Lee Evans Partnership LLP
St John's Lane
Canterbury
Kent
CT1 2QQ

16th October 2023

Dear Nathan,

Reference: Land at Rays Bottom, Walmer, Kent

Following recent discussions regarding the drainage and surface water strategy for this site, please find our response as follows.

During our inspection it was noted that the topography of this site presents an opportunity for water to naturally fall into the existing drainage system. We noted several markers (ie manhole covers and drains) along Liverpool Road which indicate the approximate position of the existing network. Based on our inspection we have assumed this network is suitable for our strategy, although confirmation on whether this is a combined sewer system or an individual foul water / surface water system is required.

Through a topographical survey and confirmation of levels, our proposed strategy would be to drain towards the "bottom" of the site (being Liverpool Road) and into the existing network. Works would coincide with the proposed roadworks. The precise capacity of the network and subsequent flow rates would be confirmed by the water body.

Flows from the site can be controlled by way of attenuating the storm water with a crated system or increasing capacity within the new proposed drainage network. This could also be restricted at point of discharge should there be an issue with flows rates by way of introducing hydro brakes or similar flow control devices.

SuDS areas could be introduced through design which would be the most beneficial way to manage rain close to where it falls, predominantly on (or close to) the surface (which often includes vegetation). Examples of this would include rain gardens, tree pits, swales and small wetland areas. All of these green features act as a "sponge" to absorb rainwater.



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Surface water can also be controlled with porous paving areas that would include baffles to assist with slower discharges into the drainage network. Obviously, the precise strategy needs further investigation but in our opinion the site does not require too much cut and fill to make the drainage work and we would be advising we work from as near to the current levels as possible. Through this strategy, we would ultimately be seeking to use the topography of the site to naturally drain towards the existing network (rather than any pumping system) whilst having mechanisms in place to control the flow rate and subsequently mitigate the impacts of this development on flooding / drainage networks.

Yours sincerely,

Tony Bowles

Managing Director
GSE Building & Civil Engineering



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Appendix 4: Heritage Desk Based Assessment



LTR/9265/1/NALE

16 October 2023

Nathan Anthony
Partner - Planning
Lee Evans Planning
St John's Lane
Canterbury
Kent
CT1 2QQ

Dear Nathan,

**Heritage Assessment
Land at Rays Bottom, Walmer**

In response to our discussion and the Inspector's remarks prompted by Dover Council's Housing Sites initiative, I have undertaken a preliminary examination of the development's impact on the built heritage in the vicinity, leveraging my expertise as an Accredited Specialist Conservation Architect.

The Site Overview

The proposed residential development is situated within the valley known as Rays Bottom, running parallel to Liverpool Road, just southwest of Walmer's urban perimeter.

To the east and north of the proposed housing, a dense woodland strip conceals the site from the adjacent fields to the east and the wooded boundary of Walmer Castle Gardens.

Archaeological Considerations

The area just inland from the coast around Walmer has a long history of occupation. Some 400m to the west of the site an excavation took place between 2004 and 2005 and discovered evidence of prehistoric and Romano-British activity as well as small finds relating to late Bronze Age and middle Iron Age (TR 34 NE 258) and a 2nd or 3rd century aisled building was found. There is a suspected site of a Roman Villa in the vicinity of Thistledown.

In the area of the proposed development an area of cropmarks representing banks of unknown date were identified in aerial photographs taken in the hot and very dry summer of 1976 but they have not been seen since.

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All around the site there are remnants of WWII defences in adjacent fields but none identified in the development site probably because it is in a hidden valley without coastal views.

The first edition of the Ordnance Survey around 1874 indicate no built features on the site and I suspect the land has been continuously farmed for many centuries.

Considering the crop marks identified in 1976, it is likely that an archaeological investigation, possibly involving trial trenches, will be a necessary component of the planning process.

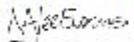
Proximity to Heritage Assets

The National Planning Policy Framework (NPPF) underscores the significance of Heritage Assets, including Listed Buildings and Historic Parks and Gardens, and emphasizes the need to evaluate any potential impact on the setting of scheduled heritage assets within the planning process.

Walmer Castle and Gardens are just to the north east of the site. The Castle is a Scheduled Historic Monument and the Gardens are on the Historic Parks and Gardens Register, and they are of National significance. Inside the garden boundaries are some features which are Listed. The Castle which sits behind the beach was built by Henry VIII between 1539 and 1540. The Lord Warden of the Cinq Ports who was often the Prime Minister used it as a place to stay and notable residents include Wellington through to Winston Churchill. Its coastal attraction and charming secluded gardens no doubt was part of its attraction as a place to visit. The density of the trees surrounding the Castle Gardens and the banks of trees just beyond as well as the lie of the land means that any low-rise housing development at Rays Bottom will have no impact on the setting of the Castle and Grounds in my opinion.

A check of the Kent Heritage Records There are no other heritage assets such as listed buildings in the immediate vicinity of the proposed housing.

Yours sincerely



Nick Lee Evans BSc(hons), MSc, Dip Arch SCA RIBA
Specialist Accredited Conservation Architect.
for and on behalf of
Lee Evans Partnership LLP