



RUBIX ESTATES

13-14 Sydney Street, Brighton, BN1 4EN

16 October 2023

Dear Louise,

RE: Hearing Statement for TC4S008 under Policy SAP 16 – Deal Small Sites

As per the Inspectors Examination Guidance Notes, please find below our response to the questions concerning site TC4S008 under Policy SAP 16 – Deal Small Sites.

This hearing statement is a collective response from the Landowners, Rubix Estates and our chosen delivery partner.

Questions

- Question 2. What is the justification for the allocation of site TC4S008? Does paragraph 99 of the Framework apply, which states that existing open space, sport and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met?
- Question 3. How has the site threshold for site TC4S008 been determined?

Response to Question 2:-

As per the emails sent Dover District Council on July 19, 2023, 26 September 2023 and 27 September 2023 we reiterate that the land and property was never open for public use for sports provision.

The former equestrian business was for private lessons only.

Since the commencement of the development of land at Cross Road, Deal, CT14 9LA, this has caused extreme disruption to the business. As a consequence, the business has been closed for 15 months and does not operate on-site due to conditions and health and safety concerns for horses and customers.

The business is on hold until site TC4S008 obtains planning permission and sells to our development partner. The landowner will find a relocation property in Dover District to recommence her riding business following the sale of the property in a more suitable environment.

Response to Question 3:-

As part of the promotion of this land for 25 homes, the Promoter on behalf of the Landowner has instructed a consultant team to assess the site and ascertain the realistic quantum of homes that can be delivered on site.

We have commissioned the following suite of technical evidence to confirm the quantum of homes is realistic:-

- A Site Analysis and Design Package prepared by Lee Evans Partnership LLP
- Indicative Site Layout, prepared by Lee Evans Partnership LLP
- Site Access Arrangement Plan, prepared by Transport Planning Associates
- Site Drainage Strategy Plan, prepared by M-EC Development Technical Consultants
- Preliminary Ecological Appraisal (PEA) by Native Ecology
- Topographical Survey by Sitech Surveying Services
- Legal Searches and Title Register check by Dean Wilson LLP

The supporting material appended to our previous representations demonstrates a scheme of at least 25 homes can be accommodated on-site. Along with our development partner we have reiterated that 25 homes can be provided on site as per the proving layout attached to this Hearing Statement.

The indicative policy-compliant layout and the attached proving layout will evolve as part of our impending planning application with our development partner (due to be submitted in Quarter 1 2024).

We look forward to working with Dover District Council and the local community on our emerging proposals.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gurdev Moore', with a horizontal line underneath the name.

Gurdev Moore
Director

Phone: 07584 415 350
Email: gurdev@rubixestates.co.uk

And on behalf of the landowners Mr Philip Laflin and Mrs Sharon Laflin