



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

##### Issue 2 – Deal Housing Sites

*Policy SAP14 – Land off Cross Road, Deal*

#### **Q1 What is the latest position regarding proposals for the site?**

##### **Q1 DDC Response:**

1. Outline planning permission for up to 140 units including affordable housing, with public open space, landscaping, and vehicular access (all matters reserved except for access) (DOV/21/01822) was resolved to be approved at planning committee in August 2023, subject to the S106 agreement being agreed. The Officer Report and minutes are available here: [Councillors and Elections \(dover.gov.uk\)](https://www.dover.gov.uk/councillors-and-elections).

#### **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 taken into account previous decisions to refuse planning permission and the issues raised?**

##### **Q2 DDC Response:**

2. The effects of development on the landscape character of the area have been considered through the Council's site assessment process, through the HELAA and Sustainability Appraisal. This has been an iterative assessment through the plan making process, taking account of responses received through consultation and additional information submitted in relation to the site. Full details of the site assessment process are set out in response to Matter 2 – Issue 4 – Question 4.
3. When assessing this site through the HELAA in 2020 (GEB09d Appendix 3A)<sup>1</sup>, it was concluded that the development of this site would have an impact on the landscape, but it was considered that it could be mitigated with suitable screening. The site was therefore not included in the detailed assessment on landscape undertaken through the Landscape Sensitivity Assessment (GEB11)<sup>2</sup>. It was however reassessed following the Regulation 18 and stakeholder consultation and the conclusion

<sup>1</sup><https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.doverdistrictlocalplan.co.uk%2Fuploads%2FSubmission-Documents%2FGEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx&wdOrigin=BROWSELINK>

<sup>2</sup> [GEB11 Landscape Sensitivity Assessment January 2021 \(doverdistrictlocalplan.co.uk\)](https://www.doverdistrictlocalplan.co.uk/gEB11-Landscape-Sensitivity-Assessment-January-2021)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

remained the same and classified the site as having 'medium landscape sensitivity' (GEB09b Appendix 1A).

4. As part of the assessment process, the planning history of the site was taken into account, including the specific details of the issues raised in the previous assessments and refusals. The policy addresses all issues previously raised in relation to density, landscape, ecology designations, flooding and drainage, and requires heritage assessments.
5. Based on the above evidence, the policy requires an appropriate landscape buffer to be determined by a Landscape and Visual Impact Assessment to mitigate the impact on wider views. It also reduced the density, by reducing the indicative capacity to 100 units. The previous application which had been refused was for up to 235 dwellings, on a larger site and therefore the assessment undertaken at that time was in a different context.
6. As set out in response to Q1 above, the site now has been resolved for granting of outline consent, subject to the section 106 being completed. The matters raised in response to previous refusals have been resolved, and the proposed scheme has been assessed as policy compliant with SAP14. Indicative plans have been submitted with the application which seek to demonstrate how the quantum of development applied for (up to 140 dwellings) could be achieved on site. The indicative plan demonstrates that only 4.17 hectares of the site would be built on (producing a density of 33.6dph), with the remaining being retained and proposed woodland and public open space.
7. The application has also been supported by a Landscape and Visual Appraisal, which sets out the typography of the site and the surrounding area, the theoretical visual envelope of the site (i.e. the areas from where the site would be visible), the location of key viewpoints of the site, the sensitivity of receptors at these viewpoints and the consequential magnitude of the landscape effect of the development. It has been concluded that although overall, the visual impact of the development would cause some moderate and minor adverse impacts to views in the area, the harm caused does weigh against the development in the planning balance.



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

- Q3 What effect will the allocation have on the safe and efficient operation of the highway network?**
- Q4 How will the necessary widening of Cross Road and the provision of a pedestrian link to the station be achieved?**

#### Q3 & Q4 DDC Response:

8. As part of the plan preparation, the Council, through transport consultants WSP, has developed a strategic traffic model which represents the impact in 2040 of the Local Plan sites in Dover and Deal as reported on in the Regulation 19 Transport Modelling Forecasting Report<sup>3</sup>. This report then undertakes detailed junction modelling at locations where Local Plan sites are impacting the performance of local junctions.
9. An assessment of the Dover Road/ Grams Road/ Station Road junction was undertaken, (see 8.1.72 in the Regulation 19 Transport Modelling Forecasting Report). This shows that with the Dover Local Plan, in 2040 the Station Road arm in the AM peak would experience delays and be over capacity. A high-level feasibility design process was undertaken to assess the impact of a signalised junction at this location. When represented in the junction model this shows it would improve the performance of the junction.
10. The Transport Assessment submitted under planning ref. DOV/21/01822 made junction capacity assessments at Station Road/Dover Road/Grams Road junction (including committed development) which indicated the junction will operate at its absolute capacity during the PM peak period. The applicant is currently formulating design works, which were established as part of the Local Plan review, for a signalisation scheme at the junction which will progress the feasibility of the design to Road Safety Audit 1 stage.
11. Condition 29 of planning ref. DOV/20/01125 (site on opposite side of Cross Road) required off site highway works, which include the widening of Cross Road and the implementation of passing places to ensure safe access for larger vehicles, a pedestrian footway along Station Road and a pedestrian crossing point at St Richards Road / Cross Road junction. Pedestrian routing to the station is proposed through the approved site (DOV/20/01125) and is secured via the Section 106 Agreement which includes a clause requiring public access 'for use by the general public'. A pedestrian crossing point at Station Road and the implementation of a footway outside the Bridleway Riding School (site policy SAP16 TC4S008) form off site highway works of both proposals. The proposed pedestrian footway is currently

<sup>3</sup> [TIEB02a Regulation 19 Transport Modelling Forecasting - Main Report October 2022](#)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

subject to a land boundary dispute, where KCC Highways Enforcement has issued notice to the riding school to reinstate the fence line back to the highway boundary due to encroachment. To ensure deliverability of the scheme, the applicant has sought to vary Condition 29 so that the works at Cross Road continue to be implemented and the works at Station Road (footway) are implemented prior to first occupation. It should also be noted that Policy SAP16 (Bridleway Riding School, Station Road, TC4S008) requires a pedestrian footway along the full length of northern boundary of the site, to connect to the existing footways, provide an off-carriageway pedestrian route to Walmer station and link to adjoining new developments in 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?**

#### Q5 DDC Response:

12. As set out in the Sequential Approach to Site Selection (CCEB02)<sup>4</sup> and the Level 2 Strategic Flood Risk Assessment (CCEB01c)<sup>5</sup> this site is located within Flood Zone 1 with less than 1% of the site at risk of surface water flooding and is therefore considered to meet the requirements of the Sequential Test.
13. A specific criterion is included within SAP14 requiring a Flood Risk Assessment to be undertaken in accordance with Policy CC5, as this is required by national flood risk policy as the site is greater than 1ha.
14. In addition, Policy CC6 – Surface Water Management applies to all new development and sets out the requirements for mitigation in relation to surface water.
15. The introductory text to the Housing and Employment Allocations chapter of the Plan at para 4.40 onwards sets this out stating that *'the site policies do not repeat other policies in the plan unless site specific issues relating to how the policies should be addressed have been identified at this stage. The Local Plan should be read as a whole.....'*
16. The Council considers that the Plan read as a whole is sufficiently clear with regard to what is expected of applications for planning permission on this site in relation to flood risk, drainage and surface water flooding. The matters have also been addressed as part of the planning application.

<sup>4</sup> [CCEB02 Sequential Approach to Site Selection \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk/CCEB02-Sequential-Approach-to-Site-Selection)

<sup>5</sup> [CCEB01c-Strategic-Flood-Risk-Assessment-Level-2.pdf \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk/CCEB01c-Strategic-Flood-Risk-Assessment-Level-2.pdf)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

##### *Policy SAP15 – Land at Rays Bottom*

**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?**

#### **Q1 DDC Response:**

17. The effects of development on the landscape character of the area have been considered through the Council's site assessment process, through the HELAA and Sustainability Appraisal. This has been an iterative assessment through the plan making process, taking account of responses received through consultation and additional information submitted in relation to the site. Full details of the site assessment process are set out in response to Matter 2 – Issue 4 – Question 4.
18. When assessing this site through the HELAA in 2020 (GEB09d Appendix 3A)<sup>6</sup>, it was concluded that the development of this site would have an impact on the landscape and that further assessment was required to demonstrate if this could be mitigated.
19. As set out in Chapter 4 of the HELAA main report (GEB09a)<sup>7</sup> paragraph 4.4, all sites were reassessed following the Regulation 18 and stakeholder consultation. This included site visits and officer assessments to address the conclusions of the 2020 suitability assessment.
20. In relation to this site, officers carried out a more detailed analysis of the site, including of the landscape character, topography, and the built form of the surrounding residential area. The site slopes from the higher level in the west, where it adjoins the rear gardens of properties in Hawksdown to the lower levels of Liverpool Road on the eastern boundary. Due to these levels, the majority of the site sits in a relatively enclosed area within the wider landscape and therefore development will have limited impact on the wider setting and landscape character in this location. It was determined that, if sensitively designed to minimise impacts on the southern boundary which adjoins the open countryside, the development impacts could be mitigated through a number of policy criteria. Following this assessment, the Council reduced the capacity of the site from the proposed 100 units in the Regulation 18 plan to seek to address the comments.
21. It is accepted that the density of this site at 75 units will be higher than the residential areas immediately adjoining the site in Hawksdown, Liverpool Road, Gram's Road and Badgers Rise, however, these areas are currently made up of generally large,

<sup>6</sup>[GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx&wdOrigin=BROWSELINK](#)

<sup>7</sup> [GEB09a HELAA Main Report October 2022 \(doverdistrictlocalplan.co.uk\)](#)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

detached dwellings in significant plots, with executive type housing. When assessing the density of the site for allocation purposes, it is based on the requirements of the site complying with the evidence-based housing mix requirements, and therefore is not based on a housing mix of large, detached dwellings, but a range of dwelling sizes and types. The site area is over 4ha and therefore an indicative capacity of 75 units would result in an overall density of less than 20 dwellings per hectare. This is less than the average densities assumed for sites on the edge of rural settlements and is appropriate based on the assessments set out above.

22. The more detailed assessment work concluded that, through policy criteria, the constraints on the site could be mitigated and therefore at the 2022 HELAA assessment stage it had been determined that the site would '*need to reflect the character of the surrounding area*' and that landscape impacts could be mitigated. (GEB09b Appendix 1A)<sup>8</sup>.
23. In summary, it is the view of the Council that development of SAP15, will create a natural extension to the current built form in the area, in a sustainable location. Policy criteria a and b have been included to reflect the assessments on landscape character, density and topography and they are considered effective and justified.

**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?**

#### Q2 DDC Response:

24. The Council's transport consultant, WSP, has developed a strategic traffic model which represents the impact in 2040 of the Plans allocations in Dover and Deal, as reported in the Regulation 19 Transport Modelling Forecasting Report (TIEB02a). This identifies parts of the road network which require mitigation because of local plan growth. The only junction in the area close to this development which has been looked in more detail is the Dover Road/ Station Road/ Gram's Road junction where the impact of signalling the junction to improve performance has been assessed.
25. Initial consultation with KCC Highways on the site carried out as part of the HELAA assessment concluded that localised widening would be required on Liverpool Road, which currently has informal passing places. A further assessment was undertaken which concluded that traffic generated by this site should distribute fairly evenly across the network dependent on whether the trip is north or southbound along the A258, which would alleviate the impact at any one junction. Even if Gram's Road took half the trip distribution, that would equate to little more than one additional vehicle movement every four/five minutes on average during the peaks.

<sup>8</sup> [GEB09b-HELAA-Appendix-1-a-to-c-HELAA-2022-Site-Assessments-October-2022.xlsx \(live.com\)](#)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

26. Opportunity to widen Liverpool Road along site frontage with formal passing places to the junction with Grams Road was identified as being feasible by the site promoter, the details are yet to be agreed by KCC Highways.
27. The criteria in the policy also require an extension to the 30mph zone and for a Transport Assessment to consider further the impacts of the development on the local road network in this area.

**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?**

#### Q3 DDC Response:

28. As set out in the Sequential Approach to Site Selection (CCEB02)<sup>9</sup> and the Level 2 Strategic Flood Risk Assessment (CCEB01c)<sup>10</sup> this site is located within Flood Zone 1 with less than 20% of the site at risk of surface water flooding and is therefore considered to meet the requirements of the Sequential Test.
29. A specific criterion is included within SAP15 requiring a Flood Risk Assessment to be undertaken in accordance with Policy CC5, as this is required by national flood risk policy as the site is greater than 1ha.
30. In addition, Policy CC6 – Surface Water Management, applies to all new development and sets out the requirements for mitigation in relation to surface water.
31. The introductory text to the Housing and Employment Allocations chapter of the Plan at para 4.40 onwards sets this out stating that '*the site policies do not repeat other policies in the plan unless site specific issues relating to how the policies should be addressed have been identified at this stage. The Local Plan should be read as a whole.....*'
32. The Council considers that the Plan read as a whole, is sufficiently clear with regard to what is expected of applications for planning permission of this site in relation to flood risk, drainage and surface water flooding.

<sup>9</sup> [CCEB02 Sequential Approach to Site Selection \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk/CCEB02-Sequential-Approach-to-Site-Selection)

<sup>10</sup> [CCEB01c-Strategic-Flood-Risk-Assessment-Level-2.pdf \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk/CCEB01c-Strategic-Flood-Risk-Assessment-Level-2.pdf)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

**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?**

#### Q4 DDC Response:

33. The effects of development on the setting of heritage assets have been considered through the Council's site assessment process, through the HELAA and Sustainability Appraisal. This has been an iterative assessment through the plan making process, taking account of responses received through consultation and additional information submitted in relation to the site.
34. Through the HELAA, the site was subject to a heritage assessment through a site assessment carried out by the Council's Principal Heritage Officer. The original heritage assessment of the site is set out in Appendix 3C of the HELAA<sup>11</sup>.
35. This assessment led to the conclusion that the need for archaeological assessment was recognised, but potential heritage impacts on the Registered Park and Garden of Walmer Castle were not identified as a concern.
36. In its response to the Regulation 19 consultation, Historic England did not raise any concerns regarding the proposed allocation. Paragraph 4.160 of the preamble notes that Hawkshill Down bounds the site which is allocated within the current Core Strategy as protected open space. The section of Hawkshill Down which sits between the boundary of the Registered Park and Garden and the site is woodland, consequently there is no inter-relationship between the site and the designated heritage asset, however the form of development and any mitigation measures that might be necessary will be guided by a Heritage Assessment, required through criteria i) and Policy HE1.
37. In conclusion, the evidence process and policy wording for the site allocation currently reflect that there are no heritage considerations that should preclude the in-principle suitability of the sites development. Therefore, the development can be subject to the usual requirements for heritage and archaeological assessment in local and national planning policy, with the means to avoid harm to significance through the design of the scheme to be determined at the planning application stage. Criteria h and i of the policy ensure this can be achieved.

<sup>11</sup> [GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx \(live.com\)](#)





## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

**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?**

#### Q5 DDC Response:

38. As set out in the Sustainability Appraisal site assessment (SD03b)<sup>12</sup>, the site was identified as having a minor negative effect on biodiversity based on its proximity to the Local Wildlife Site. Although in close proximity, it is separated from the site by Liverpool Road and no direct loss or impact is identified.
39. Policy SP13 - Protecting the District's Hierarchy of Designated Environmental Sites and Biodiversity Assets requires that development likely to have an adverse effect of locally designated environmental sites will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site and when the coherence of the local ecological network is maintained. Through the site assessment process, including in consultation with relevant stakeholders this site is not considered to have an adverse effect on the nearby sites, and includes no direct loss of habitat.
40. Criterion b of SAP15 requires consideration to enhancement opportunities and biodiversity habitat creation to respond to the nearby ecological/biodiversity assets. Criterion c requires retention of the wooded area in the north of the site and the tree and shrubland along the Liverpool Road boundary, with a requirement this is maintained and enhanced for biodiversity habitat creation. In this regard, the development of the site offers an opportunity to create an enhancement to the nearby assets. However, the design of the site proposals must also show they have responded to the nearby designations appropriately through a detailed assessment at planning application stage.

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<sup>12</sup> [SD03b Sustainability Appraisal \(SA\) Appendix F Site Assessments Sept 22 \(doverdistrictlocalplan.co.uk\)](https://www.doverdistrictlocalplan.co.uk)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

**Q6 What is the justification for the suggested changes to Policy SAP14? Why is this necessary for soundness?**

#### Q6 DDC Response:

41. *NB: This response has been answered in relation to SAP15 as it was considered that there was an administrative error in the question which identified SAP14.*
42. Proposed modification AM45 within SDO6<sup>13</sup> proposes a modification to criteria c, to ensure appropriate species and habitat surveys are carried out prior to application submission, rather than prior to determination. This is because the evidence is required by the decision maker in order to ensure that impacts have been assessed and have informed the design, layout and development capacity of the site, and to inform ecological mitigation and enhancement measures.
43. The Council considers that this change is necessary for soundness, to ensure the policy is effective and consistent with national policy and applicants are clear in which information is required to be submitted alongside a planning application.

#### Policy SAP16 – Deal Small Sites

**Q1 What is the justification for the suggested changes to Policy SAP16 (GTM003)? Why is this necessary for soundness?**

#### Q1 DDC Response:

44. Proposed Modification AM46 in SD06<sup>14</sup> is suggested to ensure that appropriate connections are made to the nearby PROW to the site. It was requested through representations on the Plan at Regulation 19 stage by KCC and the modification is agreed with KCC in the Statement of Common Ground with the council.
45. The Council considers that this change is necessary for soundness, to ensure the policy is consistent with national policy in relation to paragraph 100 of the NPPF.

<sup>13</sup> [SD06 Schedule of Additional Modifications to the Regulation 19 Submission Plan March 2023 \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk)

<sup>14</sup> [SD06 Schedule of Additional Modifications to the Regulation 19 Submission Plan March 2023 \(doverdistrictlocalplan.co.uk\)](https://doverdistrictlocalplan.co.uk)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

**Q2 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?**

#### Q2 DDC Response:

46. This equestrian facility is a relatively small (1ha overall site) private commercial riding facility with one outside arena and several associated paddocks, a barn and a stable block, linked to the sites main function of residential property and its curtilage. It was submitted for development to be allocated as a whole site.
47. With regards to the loss of the riding school, the land is not designated or permitted as sports or open space land, and equestrian use is not assessed in any of the evidence base studies undertaken for the Local Plan in relation to Open Space or Sports. The Council has been advised by the site landowner/ promoter that the riding school has been closed since early 2022 and the operating licence was not renewed after it expired in August 2022 as the current site is no longer suitable as a riding school for health and safety reasons. The Council therefore considers that the loss of the private facility had already taken place, and as the site is not specifically identified as designated Sports or Open Space land, no assessment is required in relation to paragraph 99 of the NPPF in relation to loss of a sports facility.
48. In any event, if an assessment of Paragraph 99 was undertaken, according to the British Horse Society website and other internet sources, there are several other equestrian facilities within and around the district that offer similar riding school services, some nearby to this settlement. Given the limited scale of the facility, and the supply of alternative facilities in the area the Council considers this to meet the requirements of Paragraph 99 a), in that an assessment has been undertaken and the land is surplus to requirements.
49. The owner has also confirmed an intention to relocate the riding school to another suitable location within the district in the future, therefore it is indicated that the requirements of part b) of paragraph 99 will also be met.

**Q3 How has the site threshold for site TC4S008 been determined?**

#### Q3 DDC Response:

50. An initial site capacity was identified using the density standards for the location of the site. In this case, 30dph was used (as set out in response to Matter 4 Issue 1 Q3). The capacity was refined to take account of site-specific factors. On site



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

TC4S008 specifically, the indicative capacity is based on the site size of 1ha and has taken into account the density and character of the surrounding area, including new schemes being constructed (such as 100 units in Cross Road, directly opposite) but also has factored in the adjoining countryside context and the need to provide an appropriate landscape buffer. The indicative capacity was therefore based on a slightly reduced density of 25 dwellings per hectare.

51. As can be seen in representation SDLP1387<sup>15</sup> (and Attachment 4 within it), the site promoters have provided indicative visuals and site plans, which show how this could be achievable, whilst meeting the policy requirements.

**Q4 Sites TC4S032 and TC4S047 are located within Flood Zone 3. How is development expected to mitigate against any potential harm or risk? Can the requirements of national planning policy in relation to flood risk be met?**

#### Q4 DDC Response:

52. As set out in response to Matter 1, Issue 5, the sites have been subject to the sequential test and exceptions test. Further detail is provided in CCEB01c Level 2 Strategic Flood Risk Assessment<sup>16</sup> and CCEB02 Sequential and Exception Test Summary and Review Note<sup>17</sup>.
53. Criteria in each of the site-specific issues and requirements set out how the development will need to mitigate against potential harm and risk, which will need to be informed by a site-specific flood risk assessment as part of the planning application for the development. The requirement of the policy has been informed by the site-specific assessment carried out in the Level 2 Strategic Flood Risk Assessment (FRA) and consultation with the Environment Agency.
54. As set out in the Statement of Common Ground between the Council and the Environment Agency, the Council is confident that the requirement of Policy CC5 can be met through the completion of site specific FRAs as recommended in the SFRA. The Exception Test will not be considered passed until a site-specific FRA further examines the risk and recommends appropriate mitigation measures, taking account of residual risk (the risk that remains should defences be breached or overtopped). This is likely to require habitable accommodation to be raised above design flood level, and this would be acceptable to the Council.

<sup>15</sup> See SD04 [Regulation 20 Representations \(contensis.com\)](#)

<sup>16</sup> [CCEB01c Level 2 Strategic Flood Risk Assessment](#) (December 2021)

<sup>17</sup> [CCEB02 sequential and Exemption Test Summary and Review Note](#) (May 2022)



## Council's Response to Inspectors' Matters, Issues, Questions

### Matter 3 – Housing Allocations

#### Issue 2 – Deal Housing Sites

55. The Council considers that this demonstrates that the requirements of national planning policy in relation to flood risk can be met.

#### **Q5 Are the Deal small housing sites justified, effective and consistent with national planning policy?**

##### **Q5 DDC Response:**

56. The NPPF at paragraph 35 states that Plans are 'sound' if they are:
- b) *'Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
  - c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
  - d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'.*
57. Policy SAP16 allocates four small sites for development, which are all located in or on the edge of the built confines of the settlements of District Centre Deal and a nearby smaller village of Great Mongeham. One of the sites is brownfield land, and one is partially brownfield land.
58. In allocating the sites, the Plan reflects its evidence base where each was found suitable and available for development. ED3 Selection of Site Allocations – Housing Sites Addendum (2023)<sup>18</sup> justifies the selection of the sites allocated over other options within Deal and Great Mongeham based on their ability to deliver new housing on sites that are well connected to services in these settlements. The site allocations are therefore justified.
59. The small sites allocations in Deal can, in total, deliver an indicative 48 dwellings on sites with excellent connections to the services and facilities within Deal and its surrounding rural settlements and are therefore consistent with the NPPF aim of achieving sustainable development and utilising brownfield land.

<sup>18</sup> [ED3 – Selection of Site Allocations – Housing Sites Addendum \(2023\)](#)