



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

Matter 3 – Housing Allocations

Issue 7 – St Margaret's at Cliffe Housing Sites

Issue 7 – St Margaret's at Cliffe Housing Sites

Policy SAP38 – Reach Court Farm/Roman Way

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

Q1 DDC Response:

1. Site SAP38 is not considered to be major development in the AONB for the following reasons:
 - The site is contiguous with the settlement boundary.
 - The site reflects the existing pattern of development in this part of the village.
 - The existing settlement on Reach Road includes development in depth.
 - The number of homes is small relative to the size of the settlement and views from the wider landscape (topographic features and important viewpoints are unlikely to be notably affected).
2. The Landscape Sensitivity Assessment¹ described this site as having medium sensitivity, however only the part of the site closest to the settlement (the least sensitive element) is proposed for allocation.
3. The potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, has been considered through the Council's assessment of sites in the HELAA and SA, informed by consultation with the Kent Downs AONB Unit, and the Landscape Sensitivity Assessment. This has been an iterative assessment through the plan making process, taking account of responses received through consultation as described below:
 - During consideration of the site in the 2020 HELAA, the site was subject to a desktop assessment and site visit and no known heritage impacts were identified. Comments were also received from the Council's landscape consultant and the AONB Unit, with the overall conclusion that (with appropriate design and mitigation) the northern part of the site adjacent to the settlement confines could be taken forward for development.
 - The site was subject to sustainability appraisal prior to the Regulation 18 consultation in January 2021. Both documents were subject to consultation.

¹ [GEB11 Landscape Sensitivity Assessment \(January 2021\)](#)



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- In 2021 a Landscape Sensitivity Assessment (GEB11)² was published. STM003 was one of the sites considered by this study.
 - Post the Reg 18 stage, consultation with the AONB Unit (HELAA Appendix 3g)³ resulted in a comment which supported changes to policy wording regarding design and landscaping scheme.
 - In 2022 the HELAA (HELAA 2022 Appendix 1a)⁴ identified the site as 'suitable' and the site was subject to Sustainability Appraisal which informed the final selection of sites. The suitability assessment concluded that the site forms a logical extension to the settlement, and whilst partly in the AONB the landscape impact can be mitigated through good screening.
 - The site was subject to public consultation at the Regulation 19 stage. Further comments were received from the Kent Downs AONB Unit.
 - Following consideration of comments received, the Schedule of Additional Amendments (SD06) proposes some Additional Amendments (AM64 and 65)
4. The Kent Downs AONB Unit have agreed the following in the Statement of Common Ground:

'It is agreed that the proposal does not constitute major development in the AONB, with the proposals being a logical extension to the existing settlement and approximately 60% of the site being located in the Kent Downs AONB. The potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, has been considered through the Council's assessment of sites in the HELAA and SA, informed by consultation with the Kent Downs AONB Unit, and the Landscape Sensitivity Assessment. It is also agreed that criteria a, and b of the Policy SAP38 can manage potential impacts through a sensitively designed scheme, the provision of landscape buffers, structural planting and advanced tree planting'.

² [GEB11 Landscape Sensitivity Assessment \(January 2021\)](#)

³ [GEB09d Appendix 3a to g HELAA 2020 Site Assessments \(October 2022\)](#)

⁴ [GEB09b Appendix 1a to c HELAA 2022 \(October 2022\)](#)



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

Q2 DDC Response:

5. Two changes are suggested to Policy SAP38 in the Schedule of Additional Modifications – SD06.
6. AM64 proposes amendments to clarify the relevant part (South Foreland) of the Heritage Coast Designation. It also clarifies that part of the site has the 'potential to be' contaminated. The Council does not consider these changes are necessary for soundness, but they do, however, improve clarity of the supporting text.
7. AM65 adjusts the point during site delivery at which tree planting should take place, and the wording of the associated objective to have established trees on the site to mitigate the impact of the development on the AONB. 'Maturity' means that a tree is established and produces flowers, but the time this takes varies according to the species, such that a simple reference to 'established' is preferred. The policy simply seeks to ensure that trees are in place and capable of starting to provide a landscape benefit early in the lifetime of the development. This is a minor change which adds clarity and therefore contributes to the effectiveness of the Policy in mitigating any impact upon the AONB and Heritage Coast. The Council therefore considers it is necessary for soundness.
8. In the Statement of Common Ground with the AONB Unit, the AONB agree that the proposed change set out in the Additional Modification (AM65) satisfactorily addresses their concerns.

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

Q3 DDC Response:

9. Matter 2, Issue 2 (Settlement Hierarchy), Question 2 explains the methodology used to determine which settlements fall within each category in the settlement hierarchy. St Margarets at Cliffe is a 'local centre', with a primary school, nursery school, a post office, library, a village shop, two public houses, cafés, and other community facilities.
10. Matter 2, Issue 3 (Housing Distribution), Question 1 sets out the process the Council followed to inform the distribution of new development and the reasonable judgements made. As set out in paragraph 1.7 of the Selection of Site Allocations (Housing Sites)



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Addendum⁵, the 'Council did not identify a specific number or range of number of homes that should be allocated within each rural settlement, as there were other factors that have influenced the suitability of individual settlements to accommodate a certain level of growth, including for example constraints such as the Area of Outstanding Natural Beauty, and the suitability and availability of sites'.

11. It is the Council's view that St Margaret's at Cliffe can accommodate the additional homes, given the levels of services available, subject to careful site selection given the settlements relationship with the AONB and Heritage Coast designations.
12. In terms of how the scale of development has been established, an initial site capacity was identified using the density standards for the location of the site. In this case 30 dph (as set out in response to Matter 4 Issue 1 Q3). The capacity was reduced to take account of the following site-specific factors derived from its close relationship with the settlement confines and existing development at depth accessed from Reach Road. The proposed reduced density of approximately 22.5 homes per hectare will allow for boundary planting (as required by criteria b of the policy) to mitigate impact of development on the AONB.

Policy SAP39 – West of Townsend Farm Road

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

Q1 DDC Response:

13. The site is not considered to be major development in the AONB for the following reasons:
 - The site is contiguous with the settlement boundary;
 - The site is visually well contained within the wider landscape;
 - The site relates well to the settlement and reflects the existing pattern of development;
 - The number of homes is small relative to the size of the settlement and the site is of limited prominence from important viewpoints.
 - The Landscape Sensitivity Assessment described this site as having low sensitivity.
14. The potential impacts of development on the character and appearance of the area, including the AONB, has been considered through the Council's assessment of sites in

⁵ ED3 Selection of Site Allocations Housing Sites Addendum (April 2023)



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the HELAA and SA, informed by consultation with the Kent Downs AONB Unit and the Landscape Sensitivity Assessment. This has been an iterative assessment through the plan making process, taking account of responses received through consultation as described below:

- During consideration of the site in the 2020 HELAA, the site was subject to a site visit and assessment by the Principal Heritage Officer. Concerns were identified in terms of the impact on heritage assets. Comments were also received from the Council's landscape consultant with the overall conclusion that (with design and landscaping) that the site would form a logical extension to the settlement and the impact on the AONB and the wider landscape could be mitigated.
- The site was subject sustainability appraisal prior to the Regulation 18 consultation in January 2021. Both documents were subject to consultation.
- In 2021 a Landscape Sensitivity Assessment (GEB11)⁶ was published. STM007 and STM008 were considered by this study.
- Post the Reg 18 stage, consultation with the AONB Unit (HELAA Appendix 3g)⁷ resulted in a comment which supported changes to policy wording regarding design, landscaping scheme and primary access. To ensure development appropriately considers heritage assets, officers agreed that criteria (i) will be able to ensure that a layout and design is achieved that will avoid harm to the significance of heritage assets.
- In 2022 the HELAA (HELAA 2022 Appendix 1a)⁸ identified the site as 'suitable' and the site was subject to Sustainability Appraisal which informed the final selection of sites. The suitability assessment concluded that the site provided a logical extension to the settlement. The site would need to be sensitively designed to address heritage and landscape concerns.
- The site was subject to public consultation at the Regulation 19 stage. Further comments were received from the Kent Downs AONB Unit.
- Following consideration of comments received, the Schedule of Additional Modifications (SD06) proposes an Additional Modification (AM66)

15. The Kent Downs AONB Unit have agreed the following in a Statement of Common Ground:

'It is agreed that the proposal does not constitute major development in the AONB, with the approximately 75% of the site being located in the Kent Downs AONB, and

⁶ [GEB11 Landscape Sensitivity Assessment \(January 2021\)](#)

⁷ [GEB09d Appendix 3a to g HELAA 2020 Site Assessments \(October 2022\)](#)

⁸ [GEB09b Appendix 1a to c HELAA 2022 \(October 2022\)](#)



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taking into account the relationship of the site to the existing settlement and size of St Margaret's. The potential impacts of development on the character and appearance of the area, including the AONB, has been considered through the Council's assessment of sites in the HELAA and SA, informed by consultation with the Kent Downs AONB Unit and the Landscape Sensitivity Assessment. It is also agreed that criteria a, and b of the Policy SAP39 can manage potential impacts through a sensitively designed scheme, the provision of landscape buffers and landscaping scheme informed by a Landscape and Visual Impact Assessment'.

Q2 Can a safe and suitable access be achieved for both vehicles and pedestrians? How has this been assessed as part of the allocation of the site?

Q2 DDC Response:

16. As set out in response to Matter 2 – Issue 4 – Question 3 constraint on the local highways network has been a factor influencing the selection of sites for allocation and has been informed through consultation with Kent County Council Highways (KCC) and the Transport Modelling that has been carried out. KCC have provided comments on all HELAA sites subject to the suitability assessment in relation to access requirements and potential impacts on the local highway network, with updates to their comments being provided following the Regulation 18 consultation, targeted call for sites, and in response to additional information submitted by site promoters, and post Regulation 19 stage.
17. As set out in the HELAA Appendix 3 (GEB09d)⁹ KCC Highways confirmed access was achievable from Townsend Road but would need to provide suitable visibility and pedestrian connections. Further assessment on this matter outlined a requirement for reconfiguration of the junction with Ash Grove to enable the visibility splays to be achieved. KCC Highways have confirmed that safe and suitable access for both pedestrians and vehicles can be achieved through the localised widening of Townsend Farm Road and the provision of a footway along at least part of the site frontage to connect to the wider footway network.
18. Local Plan Policy SAP39 specifies provision of an access from Townend Farm Road (criterion d), provision of localised widening of Townend Farm Road and reconfiguration of the junction with Ash Grove (criterion e) and provision pedestrian crossing improvements at Townsend Farm Road near the junction with the High Street which is considered justified based on the evidence.

⁹ [GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx \(live.com\)](#)



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Q3 What is the justification for the suggested changes to Policy SAP39? Why are they necessary for soundness?

Q3 DDC Response:

19. As set out in SD06, AM66 seeks to clarify that as well as connections to the PROW network, there should also be works that result in improvements to the network. The Council does not consider this change is necessary for soundness. It does, however, respond to a comment from Kent County Council and may result in enhancements to the accessibility and connectivity of the site. The reference to 'western boundary' is simply a clarification and is not necessary for soundness.

Policy SAP40 – St Margaret's at Cliffe Small Housing Sites

STM006 – Land at New Townsend Farm

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

Q1 DDC Response:

20. The site is not considered to be major development in the AONB for the following reasons:

- The site is contiguous with the settlement boundary;
- The site is visually well contained within the wider landscape;
- The site relates well to the settlement and reflects the existing pattern of development, which includes development extending north eastwards from Station Road;
- The number of homes is small relative to the size of the settlement and the views from the wider landscape (topographic features and important viewpoints) are unlikely to be notably affected.

21. The potential impacts of development on the character and appearance of the area, including the AONB, has been considered through the Council's assessment of sites in the HELAA and SA, informed by consultation with the Kent Downs AONB Unit, the Council's Principal Heritage Officer and the Landscape Sensitivity Assessment. This has been an iterative assessment through the plan making process, taking account of responses received through consultation as described below:



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- During consideration of the site in the 2020 HELAA, the site was subject to a site visit and assessment by the Principal Heritage Officer. Concerns were identified in terms of the impact on heritage assets, but the submitted site was much larger than the proposed allocation. Comments were also received from the Council's landscape consultant and the Kent Downs AONB Unit with the overall conclusion that there was the potential for a small portion of the site to be taken forward for development.
 - The site was subject sustainability appraisal prior to the Regulation 18 consultation in January 2021. Both documents were subject to consultation.
 - In 2021 a Landscape Sensitivity Assessment (GEB11)¹⁰ was published. STM006 was considered by this study. Although the Landscape Sensitivity Assessment described the original submission as having medium- high sensitivity, only a small proportion of that site (closest to the settlement) is proposed for allocation.
 - Post the Regulation 18 stage, consultation with the AONB Unit (HELAA Appendix 3g)¹¹ resulted in a comment which supported changes to policy wording regarding sensitive site design and retention and enhancement of trees and hedgerows. To ensure development appropriately considers heritage assets it was agreed that a policy reference to archaeology assessment will ensure that potential impact on archaeology is considered in a future planning application. Due to the distance between the site and the Conservation Area, and the intervening existing development, the site is unlikely to have any impact on the Conservation Area.
 - In 2022 the HELAA (HELAA 2022 Appendix 1a)¹² identified the site as 'suitable' and the site was subject to Sustainability Appraisal which informed the final selection of sites. The suitability Assessment confirmed that only a small part of the site was suitable for development.
 - The site was subject to public consultation at the Regulation 19 stage. Further comments were received from the Kent Downs AONB Unit.
22. The Kent Downs AONB Unit have agreed the following in a Statement of Common Ground:

'It is agreed that the proposal does not constitute major development in the AONB, with the site being contained within the wider landscape and relating well to the existing settlement.

The potential impacts of development on the character and appearance of the area, including the AONB, has been considered through the Council's

¹⁰ [GEB11 Landscape Sensitivity Assessment \(January 2021\)](#)

¹¹ [GEB09d Appendix 3a to g HELAA 2020 Site Assessments \(October 2022\)](#)

¹² [GEB09b Appendix 1a to c HELAA 2022 \(October 2022\)](#)



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assessment of sites in the HELAA and SA, informed by consultation with the Kent Downs AONB Unit and the Landscape Sensitivity Assessment. It is also agreed that the site-specific requirements set out in Policy SAP40 manage the impacts on the AONB through provision of a sensitively designed scheme and landscape buffer'.

STM010 – Land between Salisbury Road and The Droveaway

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

Q1 DDC Response:

23. The site is not considered to be major development in the AONB for the following reasons:
- The site is contiguous with the settlement boundary;
 - The site is visually well contained by existing development and trees (although ridge heights will need to be carefully considered);
 - The site relates well to the settlement form and reflects the existing pattern of development.
 - The number of homes is small relative to the size of the settlement.
 - The Landscape Sensitivity Assessment (GEB11) identified the site as low-medium sensitivity.
24. In the Statement of Common Ground, the AONB Unit states:
'It is agreed that taking into account the enclosure of the site on three sides with existing residential development and the restriction of proposed development to a maximum of 10 dwellings, it is agreed that the allocation does not represent major development'.
25. The effects of development on the character and appearance of the area including the AONB, has been considered through the Council's assessment of sites in the HELAA and SA, informed by consultation with the Council's Heritage Officer, the Kent Downs AONB Unit and the Landscape Sensitivity Assessment. This has been an iterative assessment through the plan making process, taking account of responses received through consultation as described below:
- During consideration of the site in the 2020 HELAA, the site was subject to a desktop assessment and a site visit by the Principal Conservation Officer in a site-specific heritage assessment. The need for archaeological assessment was



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recognised, but heritage impacts were not identified. Comments were also received from the Council's landscape consultant and the AONB Unit, with the overall conclusion that further assessment was required to demonstrate whether landscape impact can be mitigated.

- In 2021 a Landscape Sensitivity Assessment¹³ was published. STM010 was one of the sites considered by this study.
 - Post the Reg 18 stage, consultation with the AONB Unit (HELAA Appendix 3g)¹⁴ resulted in a comment which stated that it was essential for the policy to include an additional requirement for any built development to be located on the lower parts of the site (i.e., avoiding the higher central ridge) and a requirement for the retention of the woodland in the south-western corner of the site.
 - The site was reviewed again as part of the targeted call for sites, which reiterated previous heritage and landscape conclusions.
 - In 2022 the HELAA (HELAA 2022 Appendix 1a)¹⁵ identified the site as suitable and the site was subject to Sustainability Appraisal which informed the final selection of sites. The suitability assessment concluded the site would need to be sensitively designed with low density housing that respects the character of the area, and generous landscaping to screen the site to reduce the impact on residential amenity.
 - The site was subject to public consultation at the Regulation 19 stage. No comments were received from Historic England on the Dover Patrol Memorial. Further comments were received from the Kent Downs AONB Unit.
 - Following consideration of comments received, the Schedule of Additional Amendments (SD06) proposes some Additional Amendments (AM67)
26. The AONB unit made comments at Regulation 19. Although their Regulation 19 comment (SDLP315) stated that '*the site could be regarded as being an appropriate and logical extension to the village and acceptable in landscape terms*', they nevertheless had some concerns about the impact of topography and the extent this would have a visually damaging impact on the AONB and local historic features. The representation requested an Initial LVIA or Landscape Capacity Study to ascertain whether an allocation can be supported in landscape terms.
27. In response to this request, the site promoter has submitted a Landscape and Visual Statement prepared by Lloyd Bore. This statement (attached at Appendix 1) concludes with the following final statement (para 7.5):

¹³ [GEB11 Landscape Sensitivity Assessment \(January 2021\)](#)

¹⁴ [GEB09d Appendix 3a to g HELAA 2020 Site Assessments \(October 2022\)](#)

¹⁵ [GEB09b Appendix 1a to c HELAA 2022 \(October 2022\)](#)



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'Having visited the site and undertaken desktop research I conclude that the north-eastern and south western boundaries of the site are more sensitive in the landscape than the north western and south eastern boundaries, and that potential impacts on these boundaries resulting from the introduction of development on the site can be satisfactorily mitigated through sensitive layout and design'.

28. The suggested mitigation is summarised at paragraph 1.20 and 1.21. Dover District Council believes the mitigation suggestions are adequately accommodated in the Council's proposed policy (including the proposed Additional Amendments), the submission of an LVIA being the most important element.

29. A post submission modification to the submitted AM67 is proposed to include street frontage development along Salisbury Road, as well at the Droveaway, as follows:

The Site is in the Kent Downs AONB and South Foreland Heritage Coast. In order to minimise any impact on these protected landscapes, built development should be limited in extent, located in the lower parts of the site along the road frontage with The Droveaway and Salisbury Road, and should comprise a maximum of 10 dwellings...

30. In terms of Heritage Coast, the recently submitted landscape and Visual Statement (Appendix 1) did consider the impact on this designation, stating:

'There is no intervisibility between the site and the closest part of the Heritage coastline just to the south-east of Granville Road. Potentially sensitive distant viewpoints looking north from the publicly accessible cliff-top area known as The Front (south of St Margaret's Bay) have been investigated. The site is not visible in these views and largely hidden behind vegetation'.

31. The Council's Landscape Sensitivity Assessment takes account of natural and cultural designations, including Heritage Coast. Consideration of topography and long views is embedded in such an assessment.

32. The Council considers that taking account of the proposed modifications set out above, the development of the site is limited in scale and extent and a suitable scheme can be delivered on the site being designed to minimise adverse impacts on the AONB.

Q2 How have the effects of development on the integrity of the Dover to Kingsdown Cliffs SAC and SSSI been considered as part of the plan-making process?

Q2 DDC Response:



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33. The effects of development on Kingsdown Cliff SAC and SSSI has been considered through the Council's site assessment process, through Habitats Regulations Assessment, Sustainability Appraisal, and the HELAA. This has been an iterative assessment through the plan making process.
34. In terms of Habitats Regulations Assessment (SD09)¹⁶, the Kingsdown Cliff SAC was 'screened in' for appropriate assessment with a potential likely significant effect from air pollution and recreation. The assessment concluded that:
- For nitrogen deposition the process contribution (which considered NH³ and NO_x emissions) attributed by the Local Plan is unlikely to be significant.
 - For nitric acid deposition, the process contribution (which considered NH³ and NO_x emissions) attributed by the Local Plan is unlikely to be significant.
35. Habitat Regulations Assessment (HRA) is ongoing as stated in Matter 1, Issue 7, Question 9.
36. Mitigation measures to support these conclusions are incorporated into the plan and should be implemented. This includes Policy SP1, SP14, TI1 and NE4 and the Kent and Medway Air Quality Planning Guidance. The Council has consulted with Natural England frequently during the preparation of the HRA and a Statement of Common Ground has been prepared.
37. The Habitats Regulation Assessment (SD09) also concluded that:
- For recreation, the assessment observed that pressures are likely to be concentrated at certain locations along the coastal path (see para 5.118). Mitigation measures are recommended which include access management and monitoring (para 5.146). The National Trust have committed to an extensive programme of visitor management and mitigation measures and the Council have made a commitment through Policy SP13 to work closely with the National Trust to deliver on-site visitor management (para 1.48).
38. Natural England supports the recommendations of the Habitats Regulations Assessment subject to clarification of the commitments made on the site at Policy SP13¹⁷. AM24 of the Schedule of Additional Modification (SD06) adds the following statement after Paragraph 3.282:
- 'Comprehensive visitor survey information for the Dover to Kingsdown Cliffs SAC will be updated in conjunction with the National Trust at least every five years following the adoption of this Plan as part of ongoing work with the National Trust, as owners and*

¹⁶ SD09 Habitats Regulations Assessment (March 2023)

¹⁷ Statement of Common Ground with Natural England



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managers of most this SAC, and other partners to manage recreational pressures at this site.'

39. The Sustainability Appraisal¹⁸ (p762) scored the site according to its location within the SSSI Impact Risk Zone (although the development would not be of sufficient size to require consultation with NE). This also captures the proximity to the SAC designation.
40. The HELAA would have excluded submitted sites within a SSSI/SAC. The position of a site within a SSSI Impact Risk Zone (such as STM010) was not a constraint that could result in the elimination of a site from the HELAA Assessment. The presence of a site within an Impact Risk Zone (which are primarily used to assess planning applications for likely impacts on SSSI's/SACs/SPAs and Ramsar sites) gives advice on the types of development that must result in a consultation with Natural England. The Council consulted with NE closely through the preparation of the Local Plan, and no objection was made to the allocation of STM010 during (or after) the Regulation 19 consultation.

Q3 What is the justification for requiring a speed survey? Is it clear to users of the Plan what is required from development proposals?

Q4 Can a safe and suitable access be achieved for both vehicles and pedestrians? How has this been assessed as part of the allocation of the site? Where will access be taken from?

Q3 and Q4 DDC Response:

41. A speed survey is not required for STM010 but is required for STM006.
42. As set out in response to Matter 2 – Issue 4 – Question 3 constraint on the local highways network has been a factor influencing the selection of sites for allocation and has been informed through consultation with Kent County Council Highways (KCC) and the Transport Modelling that has been carried out. KCC have provided comments on all HELAA sites subject to the suitability assessment in relation to access requirements and potential impacts on the local highway network, with updates to their comments being provided following the Regulation 18 consultation, targeted call for sites, and in response to additional information submitted by site promoters, and post Regulation 19 stage.
43. The highways assessment in the HELAA Appendix 3B¹⁹ KCC identified some concern over the access, some of these concerns were resolved through the identification of an alternative access point, but KCC considers a Speed Survey is required to ensure

¹⁸ SD03b Sustainability Appraisal Appendix F site Assessment

¹⁹ [GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx \(live.com\)](#)



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sufficient visibility to the south. The council considers the wording of the policy to be clear in and justified in this regard but would not object to further modification to add clarity as to its purpose.

44. Access can be taken from either The Drove way or Salisbury Road. The further modification at question 1 clarifies that development should be located in the lower parts of the site along the road frontage with The Drove way and Salisbury Road.

Q5 How have the effects of development on the setting of heritage assets such as the grade II* listed Dover Patrol War Memorial and the St Margaret's Bay Conservation Area been considered? Can a suitable scheme be achieved on this site whilst maintaining the significance of these heritage assets?

Q5 DDC Response:

45. 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 as described below:
- During consideration of the site in the 2020 HELAA, the site was subject to a desktop assessment and a site visit by the Principal Conservation Officer in a site-specific heritage assessment. The original heritage assessment of the site is set out in Appendix 3C of the HELAA. The need for archaeological assessment was recognised, but other heritage impacts were not identified.
 - The site was reviewed again as part of the targeted call for sites, which reiterated previous heritage conclusions.
 - In 2022 the HELAA Assessment identified the site as suitable and the site was subject to Sustainability Appraisal which informed the final selection of sites.
 - The site was subject to public consultation at the Regulation 19 stage. No comments were received from Historic England on the Dover Patrol Memorial. The St Margarets Bay Conservation Association did not make comments in relation to the conservation area: existing development physically and visually separates the site from the conservation area.
 - Following consideration of representations received in response to the Regulation 19 consultation, the Schedule of Additional Modifications (SD06) proposes some Additional Modifications (AM67). These include the requirement for a Landscape and Visual Impact Assessment to take account of any potential impact on the setting of the grade II* Dover Patrol Memorial, and to identify appropriate ridge



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heights in order to ensure that the contribution the setting makes to the significance of the listed structure is appropriately recognised and addressed in any proposed development.

Q6 What is the justification for the suggested changes to Policy SAP40? Why are they necessary for soundness?

Q6 DDC Response:

46. The proposed Additional Modification (AM67) provides additional detail to ensure the policy is clear, effective, and consistent with national policy, with particular regard to the ensuring the development of the site can mitigate any impacts upon the AONB. The Council therefore consider the modification is necessary for soundness.
47. A post submission modification to the submitted AM67 is proposed to include street frontage development along Salisbury Road, as well at the Droveaway, as follows:

The Site is in the Kent Downs AONB and South Foreland Heritage Coast. In order to minimise any impact on these protected landscapes, built development should be limited in extent, located in the lower parts of the site along the road frontage with The Droveaway and Salisbury Road, and should comprise a maximum of 10 dwellings...



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LANDSCAPE AND VISUAL STATEMENT

DAVID POWELL
SALISBURY ROAD, ST MARGARET'S AT CLIFFE
DOVER, KENT

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1. SUMMARY

Landscape and visual assessment

- 1.1 A formal Landscape and Visual Impact Assessment or Appraisal in accordance with the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and IEMA GLVIA 3rd 2013) has not been undertaken as currently there are no finalised design proposals to assess.
- 1.2 In January 2021 Dover District Council produced the document 'Landscape Sensitivity Assessment of proposed development sites' (Douglas Harman Landscape Planning). The purpose of the document was set out as follows (para 1.1):
- 1.3 *'This report examines the landscape sensitivity of 33 sites (as selected by the Council) that have been put forward for development as part of the emerging Dover District Local Plan. The primary aim of this is to identify those sites which, in landscape terms, may have some opportunity for development and conversely, those that might be more unsuitable.'*
- 1.4 The 2021 report also states (para 1.15):
- 1.5 *In identifying landscape sensitivity and applying the findings to the emerging Dover District Local Plan, it is also important to note that the findings of this report are strategic in nature and do not preclude the need for an LVIA (or similar appraisal) to be undertaken as part of a planning application.*
- Designations and site characteristics*
- 1.6 The site is within a designated AONB and defined Heritage Coast.
- 1.7 The site is surrounded by low density housing on three sides, and by open access land (National Trust) to the north east. It is well-related to the existing settlement pattern of the village.
- 1.8 It possesses well-defined boundaries.
- 1.9 The site possesses a fairly level and even topography.
- 1.10 The south western section of the site is elevated above the Public Right of Way which runs outside the site's south west boundary, and above adjacent housing on the land south west of the Public Right of Way.
- 1.11 The north eastern boundary is adjacent to an area of open access land owned by the National Trust (Bockell Hill).

- 1.12 Vegetation interest is confined to the site boundaries and to a small area of woodland on the south eastern boundary. The Salisbury Road and Droveaway boundaries are characterised by mature hedgerows and trees.

Views:

- 1.13 The site is not visible from the area around the Dover Patrol Memorial. The upper part of the memorial is visible from some parts of the site.
- 1.14 There are potentially sensitive views south towards the site's northern boundary from the National Trust open access land to the north (Bockell Hill).
- 1.15 There is no intervisibility between the site and the closest part of the Heritage coastline just to the south east of Granville Road. Potentially sensitive distant viewpoints looking north from the publicly accessible cliff-top area known as The Front (south of St Margaret's Bay) have been investigated. The site is not visible in these views and largely hidden behind vegetation.

Private visual amenity of local residents:

- 1.16 The Droveaway: fronts of dwellings are aspected towards the site, generally set back from the road behind vegetated front gardens. A number of these dwellings are bungalows, concentrated in the south west section of The Droveaway. There is a substantial belt of mature vegetation along the south eastern verge of The Droveaway to protect private visual amenity. Further mitigation could be achieved by reinforcing this landscape belt, by setting new dwellings back from The Droveaway, and by restricting the height of new dwellings.
- 1.17 Salisbury Road: fronts of dwellings are aspected towards the site. Sea views likely gained from rear windows facing south east. There is a substantial belt of mature vegetation along the north western verge of Salisbury Road to protect private visual amenity. This includes a small area of woodland in the south western apex of the site. Mitigation could be achieved by reinforcing this landscape belt, by setting new dwellings back from Salisbury Road and by restricting the height of new dwellings.
- 1.18 There are two dwellings just beyond the south west boundary of the site. A PROW also runs along this boundary. As site levels here are set above the land to the south west the layout of any proposal will need to be sensitive to the potential for impacts upon the dwellings and users of the PROW, and to ensure these are mitigated.

- 1.19 Mitigation could be achieved by reinforcing the landscape belt along the north eastern boundary of the PROW, by setting new dwellings back from the PROW and by restricting the height of new dwellings in this part of the site.

Recommended mitigation

- 1.20 The design of development proposals for the site, in terms of layout, density, height, materials and landscape treatment should be informed and assessed through Landscape and Visual Appraisal or Impact Assessment processes as set out in the 'Guidelines for Landscape and Visual Impact Assessment' published by the Landscape Institute and IEMA (3rd Edition 2013).
- 1.21 Notwithstanding the findings of a future project-specific LVIA, the desktop and fieldwork undertaken to date suggests that this site could accommodate a sensitively designed residential development without significant adverse effects. The following design measures would mitigate the impact of proposed development on the site and its surroundings:
- Retention of an area of undeveloped land along the north eastern boundary, providing improved access to the National Trust land at Bockell Hill, and protecting its setting by planting new native species hedgerows and trees.
 - Protecting and reinforcing existing boundary vegetation in accordance with the methodology set out in BS5837 'Trees in Relation to design, demolition and construction.'
 - Ensuring mitigation planting works are not conveyanced into private plots, and that all mitigation landscape works are managed appropriately to ensure they fulfil their design function. This could be achieved through a Landscape and Ecological Management Plan, or similar vehicle, to be agreed with the local planning authority.
 - Setting back new development from the south western boundary of the site to prevent built development from having an overbearing impact on the Public Right of Way and adjacent houses immediately to the south west.
 - Creating a strong, planted south western landscape boundary to mitigate to forge ecological linkages with existing habitats and mitigate views from the south west.

2. INTRODUCTION

- 2.1 This document has been produced on behalf of David Powell in relation to the forthcoming Examination of the Dover District Local Plan in connection with the proposed allocation for residential use of a parcel of land located between Salisbury Road and The Droveaway, St Margaret's at Cliffe, Dover.
- 2.2 This land is referred to under Policy SAP40 – St Margaret's at Cliffe Small Housing Sites, and specifically as 'STM010 – Land between Salisbury Road and The Droveaway' in the Planning Inspectorate's 'Matters, Issues and Questions' document dated 30 August 2023.
- 2.3 The Matters, Issue and Questions raised by the Inspector in relation to this site are as follows:
- Q1 Does the site allocation represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, been considered, having particular regard to the topography of the area?
 - Q2 How have the effects of development on the integrity of the Dover to Kingsdown Cliffs SAC and SSSI been considered as part of the plan-making process? What mitigation, if any, is required?
 - Q3 What is the justification for requiring a speed survey? Is it clear to users of the Plan what is required from development proposals?
 - Q4 Can a safe and suitable access be achieved for both vehicles and pedestrians? How has this been assessed as part of the allocation of the site?
 - Where will access be taken from?
 - Q5 How have the effects of development on the setting of heritage assets such as the Grade II* listed Dover Patrol War Memorial and the St Margaret's Bay Conservation Area been considered? Can a suitable scheme be achieved on this site whilst maintaining the significance of these heritage assets?
 - Q6 What is the justification for the suggested changes to Policy SAP40? Why are they necessary for soundness?
- 2.4 This statement relates specifically to the second part of Q1; namely, 'How have the potential impacts of development on the character and appearance of the area, including the AONB and Heritage Coast, been considered, having particular regard to the topography of the area?'

2.5 This statement does **not** constitute a formal Landscape and Visual Appraisal as set out in the Landscape Institute / IEMA publication 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA 3rd Edition 2013).

2.6 In Dover District Council's 'Selection of Site Allocations Housing Sites Addendum ED3 (April 2023) the site is described as:

STM010 (SAP 40) Land located between Salisbury Road and The Droveaway – 10 dwellings. The site was added as one of the new housing allocations in the Regulation 19 Local Plan, following the Targeted Call for Sites undertaken at Regulation 18. The site was best performing in the SA assessment. The site comprises agricultural land with an area of trees in the southern corner and forms part of the AONB and Heritage Coast. The site is partly enclosed by hedgerows and existing residential development but is more open to the north-east, where it connects with the wider AONB and Heritage Coast. Development of the site would provide a logical extension to the settlement with development proposed to be confined to the street frontage of Salisbury Road, most of the site would remain as landscape buffer.

'The sites identified as being suitable in St Margaret's are those which do not have an unacceptable impact upon the Kent Downs AONB and its setting, and have been informed by consultation with the Kent Downs AONB Unit.'

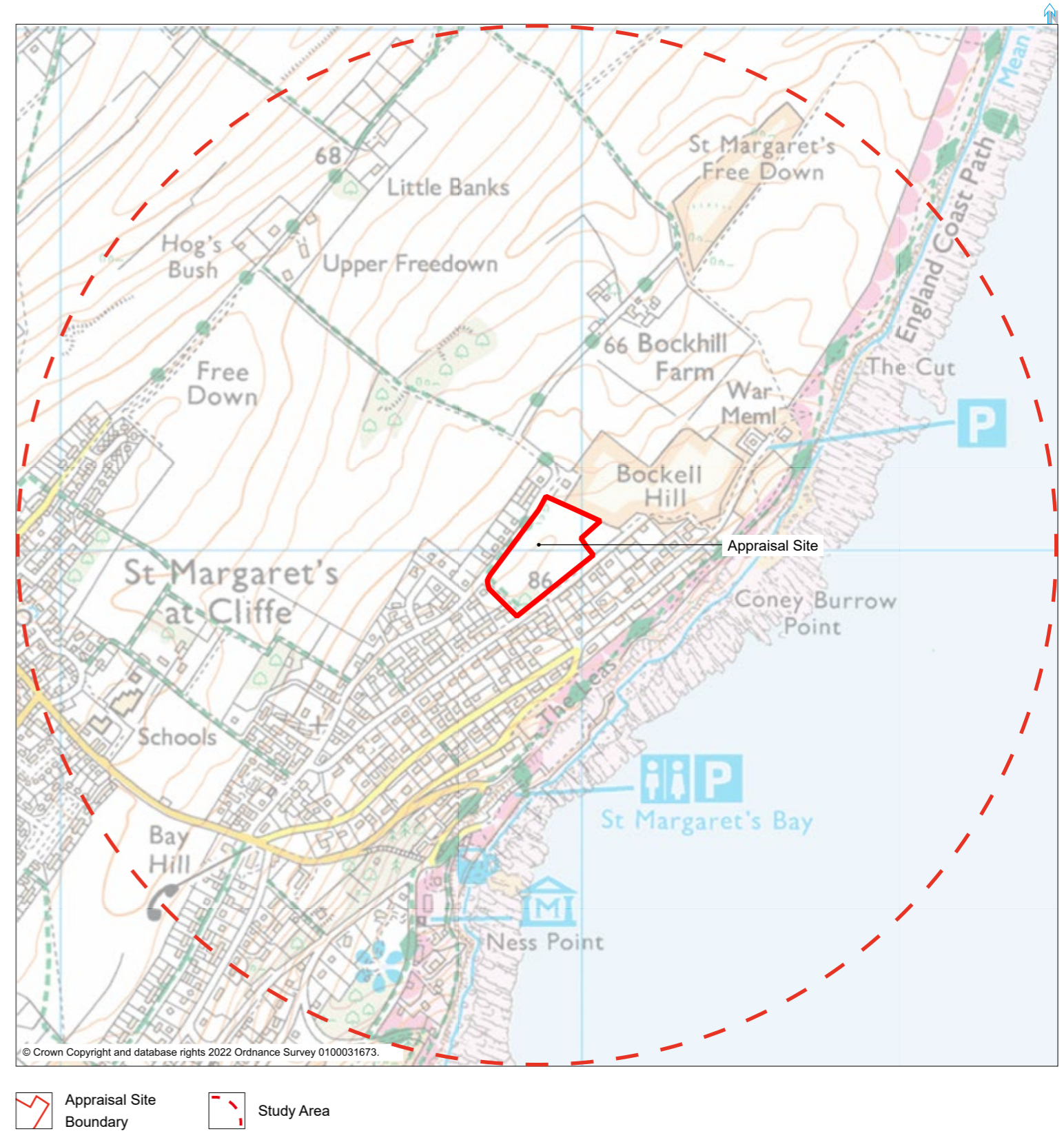
ABOUT THE AUTHOR

2.7 Julian Bore is a Chartered Landscape Architect with many years' experience designing landscape schemes and undertaking Landscape and Visual Impact Assessments and Appraisals.

3. THE SITE

- 3.1 The site location and context is indicated opposite. A 2km diameter 'study area' circle is indicated on the report mapping centred on the site. This has no significance other than to identify the site in its wider context and provide an indication of scale.
- 3.2 The site is located between The Droveaway and Salisbury Road approximately 330m south west of the Dover Patrol Memorial and 450m north east of the Coastguard Pub at St Margaret's Beach. The south eastern boundary of the site lies approximately 200m from the coast.
- 3.3 The land is currently farmed (arable).

Fig. 1: Ordnance Survey map indicating site location, surrounding features, and established study area.



4. LANDSCAPE CHARACTER

NATIONAL

- 4.1 The site is located within Natural England's national character area profile 119 (North Downs).
- 4.2 Key characteristics of this NCA are summarised as follows:
- Cretaceous Chalk forms the backbone of the North Downs. A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France.
 - The broad dip slope gradually drops towards the Thames and the English Channel, affording extensive views across London and the Thames Estuary. The carved topography provides a series of dry valleys, ridges and plateaux.
 - Chalk soils are predominant across the NCA but the upper part of the dip slope is capped by extensive clay-with-flint deposits. Patches of clay and sandy soils also occur with coombe deposits common in dry valleys.
 - The North Downs end at the dramatic White Cliffs of Dover, one of the country's most distinctive and famous landmarks. Most of the coast between Kingsdown and Folkestone is unprotected, allowing for natural processes. The cliffs are home to internationally important maritime cliff-top and cliff-ledge vegetation.
 - The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope.
 - The fertile and lighter soils of the footslopes and valley bottoms support arable farming.
 - The south-facing scarp is incised by a number of short, bowl-shaped dry valleys, cut by periglacial streams and often referred to as combes. The undulating topography of the dip slope has also been etched by streams and rivers, today forming dry valleys, some of which carry winterbournes that occasionally flow in the dip slope, depending on the level of the chalk aquifer.
 - The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production.

- Woodland is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Wellwooded hedgerows and shaws are an important component of the field boundaries, contributing to a strongly wooded character. Much of the woodland is ancient.
- Tracts of species-rich chalk grassland and patches of chalk heath are important downland habitats and of international importance.
- Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope. Defensive structures such as castles, hill forts and Second World War installations, and historic parks, buildings and monuments are found throughout.
- Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern, with local flint, chalk and Wealden brick the vernacular materials.
- In the western part of the area, around and to the west of Sevenoaks and into Surrey, there is increased urban development.

REGIONAL / COUNTY

- 4.3 The site is not included within a defined landscape character area in Kent County Council's Landscape Assessment of Kent 2004. It is shown in the mapping as within the settlement of St Margaret's at Cliffe.
- 4.4 The KCC study indicates the adjacent South Foreland Landscape Character Area wrapping around the settlement of St Margaret's at Cliffe.
- 4.5 Characteristic features of this character area are summarised as follows:
- White Cliffs of Dover. Exposed hilltop, open, rolling cultivated fields.
 - Landmarks visible. Vast horizons of sea and sky.
 - Sparse tree cover.
 - 19th century enclosure pattern breaking down.
 - Radio masts intrude into views.

LOCAL

- 4.6 The site is not included within a defined landscape character area in Dover District Council's Landscape Character Assessment, dated October 2020, because it is within the Kent Downs AONB designation.

KENT DOWNS AONB LANDSCAPE CHARACTER

- 4.7 The site is located within the White Cliffs Coast Landscape Character Area 3A in the Kent Downs AONB designation (Kent Downs AONB Landscape Character Assessment Update 2020).
- 4.8 Summary Characteristics set out for this character area in the Kent Downs AONB Management Plan are as follows:
- Underlying chalk geology, spectacularly revealed in high white cliffs at the coast.
 - Dramatic coastal landforms include cliffs, landslips and pebble beaches. Above the cliffs, the land forms a gently undulating coastal plateau punctuated by dry valleys.
 - Relatively few trees, creating an open landscape, although there is secondary woodland in sheltered valleys and on landslips.
 - Dominant land use is arable agriculture within large, open fields. Also extensive areas managed for recreation and/or nature conservation.
 - Important semi-natural habitats include coastal chalk grassland, secondary woodland and scrub, cliffs, landslip and shoreline habitats.
 - Extensive archaeological and heritage sites, particularly relating to defence and communication over two millennia.
 - Limited settlement within the LCA, although Folkestone, Dover and smaller 20th Century coastal settlements are adjacent. Scattered farms in the east of the LCA.
 - Relatively few roads, but A20 has an impact where it runs close to the coast.
 - An exceptionally open and exposed landscape, with a strong awareness of the presence of the sea in sights, sounds and smells.
 - Popular for recreation, with coastal path, Country Parks, visitor centre and golf courses.
 - Prominent landmarks include White Cliffs, Dover Castle, Port of Dover and South Foreland lighthouse.
- 4.9 The 'South Foreland Chalk Coast' is identified as a Local Character Area within the wider White Cliffs Coast typology. The AONB assessment states:

4.10 *'Behind and beyond the chalk cliffs, the landscape and seascape of this coastal section of the AONB epitomises the windswept Channel coastline of the imagination – tufts of windblown thorn and scrub cling to the edges of the huge, rolling fields and the landscape is dominated by the vast horizons of sea and sky. This unique area is one of the most open and wild landscapes in Kent, and is literally and metaphorically 'on the edge'. The sparse tree cover and the rolling, open countryside allow coastal landmarks such as Dover Castle, South Foreland Lighthouse and the Dover Patrol Memorial to stand out. It also results in an open landscape of uncluttered skylines which is very vulnerable to any form of development.'*

NPPF and AONB (July 2022, updated 5 September 2023)

4.11 Paragraph 176 of the NPPF (July 2022, updated 5 September 2023) states:

4.12 *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads.. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*

Dover District Local Plan (2002) and AONB

4.13 Policy CO2 of the adopted Dover District Local Plan states:

4.14 *'Within the Kent Downs AONB, priority will be given to the conservation and enhancement of the natural beauty of the landscape over other planning considerations. Development which would have an adverse effect upon the natural beauty of the area, including the landscape character and its components, will not be permitted unless it is essential to meet a demonstrable economic or social need which cannot be met elsewhere. In all cases development must be appropriate in location, and incorporate design and associated landscape features and measures to minimise impact on both the immediate and the wider landscape.'*

HERITAGE COAST

4.15 The site lies within a defined Heritage Coast. Heritage coasts are 'defined' rather than designated. Unlike National Parks and AONB there is no statutory designation process. They were established to conserve the best stretches of undeveloped coast in England. A heritage coast is defined by agreement between the relevant maritime local authorities and Natural England. South Foreland Heritage Coast was defined in 1998.

Purpose of Heritage Coasts

4.16 Heritage coasts were established to:

- conserve, protect and enhance:
 - the natural beauty of the coastline
 - their terrestrial, coastal and marine flora and fauna
 - their heritage features
- encourage and help the public to enjoy, understand and appreciate these areas
- maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures
- take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts.
- encourage and help the public to enjoy, understand and appreciate these areas
- maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures
- take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts

4.17 Heritage coasts are protected through development control mechanisms within the planning system.

NPPF and Heritage Coast (July 2022, updated 5 September 2023)

4.18 Para 178 states: 'Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 176*), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.'

4.19 *Paragraph 176 related to conserving and enhancing National Parks, the Broads and AONB, as previously referenced. The site is within AONB.

Dover District Local Plan (2002) and Heritage Coast

4.20 Policy CO5 of the adopted Dover District Local Plan (2002) states:

4.21 *'Development will only be permitted on the Undeveloped or Heritage Coasts, if:-*

1. *a coastal location is essential and no suitable alternative site exists;*
2. *the development is not in an area of eroding cliffs or unstable land;*
3. *it would not result in the need for coastal protection works; and*
4. *there is no adverse off-shore impact.*

4.22. *Additionally, on the Heritage Coasts, development will not be permitted if it would adversely affect the scenic beauty, heritage or nature conservation value of a Heritage Coast or the Undeveloped Coast.'*

The Kent Downs AONB Unit consultation

- 4.23 The Kent Downs AONB Unit consultation response dated 30/11/22 (comment ID SDLP268) did not support the proposed allocation, of SM010 on the grounds that it had not been demonstrated that the allocation is consistent with national planning policy, and in particular paragraphs 174, 175 and 176 of the NPPF that seek to protect and enhance valued landscapes, allocate land with the least environmental value and give great weight to conserving and enhancing AONBs:

SAP 40 St Margarets STM 010 Salisbury Rd/The Droveaway:

'The site lies wholly with the AONB boundary and Heritage Coast designation. It is therefore imperative that if development of the site takes place, it would meet the purpose of AONB designation, i.e. the conservation and enhancement of natural beauty.'

In respect of landscape character, the land comprises an arable field with a small, wooded copse in its south-eastern corner and has vegetative enclosure along its boundaries with Salisbury Road and The Droveaway. While not containing any particularly notable landscape features, the site is rural in character and associates more closely with its surrounding rural environs than the housing associated with St Margarets to the south. Its rural character provides a green 'finger' into the settlement, softening the village's built up edge and the sense of transition between the village and the undeveloped countryside beyond.

Notwithstanding these characteristics, the site is surrounded on three sides by existing built form, with a further dwelling also sited against the fourth boundary, although the majority of this northern boundary adjoins rural Open Access land. As stated above, it also has a relatively strong enclosure in landscape terms as a result of vegetation along much of its boundaries with residential development beyond. In these respects, the site could be regarded as being an appropriate and logical extension to the village and acceptable in landscape terms.

However, this fails to take into account a key aspect of the site; its topography. The site comprises a mound of higher ground that rises significantly above the surrounding land levels (at least 4 metres), upto a high point of 90m AOD, which is by far the highest point within this part of St Margarets and some 5 metres higher than the ground level of the War Memorial monument sited north east of the proposed allocation.

As such, the AONB Unit has concerns that a residential development in this location could introduce built form into the landscape that is much more prominent in views from the surrounding AONB than the existing built form associated with St Margarets, which could be visually damaging to this part of the Kent Downs AONB. This would include from the north and north-east where there is an extensive and well used public rights of way network, including the England Coast Path, a National Trail, along with several areas of Open Access land. It may also introduce housing development into views where there currently are none from the AONB to the south. The introduction of built form in this location could also impact on views of important historic features in the landscape in this location, such as the Dover Patrol Memorial monument and lighthouse at South Foreland, both iconic features that are located within the Kent Downs landscape. While there is no detail provided of the proposals at this stage, our concerns are exacerbated by development being likely to comprise larger size houses by virtue of the low density that is proposed.

Views to, from and within the AONB are an integral part of the scenic beauty of the designated landscape and one of its 'special qualities'. In other words, they are a key attribute on which the priorities for the area's conservation, enhancement and management should be based. The views out from the chalk scarp of the North Downs were a key reason for the designation of the AONB. This feature has remained critical to its value and to public enjoyment ever since. Section 1.2. of the AONB Management Plan, on 'Special characteristics and qualities' states: "The Kent Downs dramatic and diverse topography is based on underlying geology. Key features comprise: impressive south-facing steep slopes (scarps) of chalk and greensand....Breath-taking, long-distance panoramas are offered, often across open countryside, estuaries, the sea from the scarp, cliffs and plateaux..." The visual sensitivities of the coastal area between Dover and Kingsdown are specifically noted in the Landscape Character Assessment Update of the Kent Downs AONB, where at para. 8.2.6 it is stated 'The sparse tree cover and the rolling, open countryside allow coastal landmarks such as Dover Castle, South Foreland Lighthouse and the Dover Patrol Memorial to stand out. It also results in an open landscape of uncluttered skylines which is very vulnerable to any form of development'. Principle SD 8 of the AONB Management Plans requires 'proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB.'

The potential impacts on the AONB landscape are acknowledged in the evidence base for the Local Plan with the Sustainability Appraisal acknowledging that 'The site has been judged by Council officers to have the potential to moderately affect the District's landscapes, townscapes or seascape'. Further detail is provided in the HLAA Landscape Assessment DDC Landscape Assessment where it is stated 'The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE.

The site is on a crest of a hill and despite the screening, would be visible from a long distance. The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of The Droveaway to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking opportunities. The site is within the 'restore and conserve' area of the Green Infrastructure network, reflecting the real opportunities for Green Infrastructure. Any development on the site would need to be low density and to conform with surrounding street pattern, with generous landscaping required to mitigate the impact on the wider landscape'. The site is given a yellow Rag Rating and the commentary advises 'The development of this site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.'

No such further assessment appears to have been carried out. Given the sensitivities of the site, we consider an initial LVIA or landscape capacity study is required to help ascertain whether a development could be introduced onto the site while conserving key views and protecting the scenic beauty of the Kent Downs AONB. Without this, the Kent Downs AONB Unit considers that the current evidence base does not appear to support the allocation of this site in landscape terms and the policy is considered Unsound, as it has not been demonstrated that the allocation is consistent with national planning policy, and in particular paragraphs 174, 175 and 176 of the NPPF that seek to protect and enhance valued landscapes, allocate land with the least environmental value and give great weight to conserving and enhancing AONBs.'

**DOVER DISTRICT COUNCIL LANDSCAPE SENSITIVITY
ASSESSMENT JANUARY 2021**

- 4.24 In January 2021 Dover District Council produced the document 'Landscape Sensitivity Assessment of proposed development sites' (Douglas Harman Landscape Planning). The purpose of the document was set out as follows (para 1.1):
- 4.25 *'This report examines the landscape sensitivity of 33 sites (as selected by the Council) that have been put forward for development as part of the emerging Dover District Local Plan. The primary aim of this is to identify those sites which, in landscape terms, may have some opportunity for development and conversely, those that might be more unsuitable.'*
- 4.26 The 2021 report also states (para 1.15):
- 4.27 *In identifying landscape sensitivity and applying the findings to the emerging Dover District Local Plan, it is also important to note that the findings of this report are strategic in nature and do not preclude the need for an LVIA (or similar appraisal) to be undertaken as part of a planning application.*
- 4.28 Land between The Droveaway and Salisbury Rd is identified as STM010/011. STM010 is the bulk of the land under the draft allocation and to which this statement relates. STM011 related to a smaller paddock of land adjacent to the east, fronting onto Salsbury Road.
- 4.29 In the 2021 Landscape Sensitivity Assessment, draft allocation STM010/011 is described as follows:
- 4.30 *Located within the AONB on the north-eastern edge of the village, the site occupies an arable field and a small paddock. Beyond field boundary trees, residential development is located to the north, west and south of the site with informal open space (National Trust) located beyond the eastern boundary.*
- 4.31 *The site forms part of the White Cliffs Coast: South Foreland LCA, located in the far east of the Kent Downs AONB, to the south and east of the East Kent Downs LCA. It encompasses the coastal area between Folkestone and Kingsdown. It includes the settlement of St Margaret's at Cliffe, and forms the setting to Dover and to Folkestone. Its key characteristics are:*
- 4.32 *Underlying chalk geology, spectacularly revealed in high white cliffs at the coast.*
- 4.33 *Dramatic coastal landforms include cliffs, landslips and pebble beaches. Above the cliffs, the land forms a gently undulating coastal plateau punctuated by dry valleys.*
- 4.34 *Relatively few trees, creating an open landscape, although there is secondary woodland in sheltered valleys and on landslips.*
- 4.35 *Dominant land use is arable agriculture within large, open fields. Also extensive areas managed for recreation and/or nature conservation.*
- 4.36 *Important semi-natural habitats include coastal chalk grassland, secondary woodland and scrub, cliffs, landslip and shoreline habitats.*
- 4.37 *Extensive archaeological and heritage sites, particularly relating to defence and communication over two millennia.*
- 4.38 *Limited settlement within the LCA, although Folkestone, Dover and smaller 20th Century coastal settlements are adjacent. Scattered farms in the east of the LCA.*
- 4.39 *Relatively few roads, but A20 has an impact where it runs close to the coast.*
- 4.40 *An exceptionally open and exposed landscape, with a strong awareness of the presence of the sea in sights, sounds and smells.*
- 4.41 *Popular for recreation, with coastal path, Country Parks, visitor centre and golf courses.*
- 4.42 *Prominent landmarks include White Cliffs, Dover Castle, Port of Dover and South Foreland lighthouse.*
- 4.43 The 2021 assessment sets out the following criteria for evaluation of each of the sites.
- Landscape character
 - Landscape role
 - Settlement
 - Views and visibility
 - Value
 - Mitigation
- 4.44 It goes on to evaluate STM010/011 as follows:
- 'Landscape character:**
- 4.45 *The landform of the site and its setting is mostly flat and development would result in little change to it – lower susceptibility.*
- 4.46 *The landcover pattern is simple and some development would relate well to its scale – lower susceptibility.*
- 4.47 *Considering the nearby influences of built development, any further development would relate well to the settled context – lower susceptibility.*
- 4.48 *The site has very few distinctive landscape characteristics and any development would be largely contained within existing development, trees and other vegetation – lower susceptibility.*
- Landscape role:**
- 4.49 *The site provides some localised separation function between settlement to the north and south of the site – higher susceptibility.*
- 4.50 *The site provides no gateway function when travelling into the village – lower susceptibility.*
- 4.51 *Although the site provides some very localised and relatively rural setting to nearby settlement, it is not especially distinctive – lower susceptibility.*
- Settlement:**
- 4.52 *Development would relate well to the form of the village – lower susceptibility.*
- 4.53 *Development would relate quite well to adjacent urban edges although it would be sited on slightly higher ground than existing dwellings – higher susceptibility.*
- Views and visibility**
- 4.54 *Although an open coastal landscape extends to the north-east, the site is partly visually contained by existing development, trees and other vegetation – lower susceptibility.*
- 4.55 *Sited on higher ground than surrounding development, two-storey dwellings could be quite visible on the edge of the village – higher susceptibility.*
- Value**
- 4.56 *When travelling along sections of nearby Core Path, potential views of development are likely to be partly screened by intervening trees and other vegetation – lower susceptibility.*
- 4.57 *Although there are some obvious man-made features in the locality, the open field and surrounding trees contribute to the scenic quality of the AONB – higher susceptibility.*

Mitigation

4.58 *There is potential to plant some trees along site boundaries, especially to the north-east.*

4.59 *Any development should also be one storey to minimise visual impact.'*

Summary

4.60 In summary the 2021 assessment for concludes that the Sensitivity STM010/011 is Low-medium, stating:

4.61 *'The site is able to accommodate residential development in some situations without significant landscape/ visual change. Many aspects of development (with appropriate design and mitigation) could potentially relate to the area'.*

5. INDICATIVE LAYOUT OPTIONS

INDICATIVE LAYOUT OPTIONS

- 5.1 Two indicative layouts have been provided by the project architect, shown opposite.
- 5.2 Option A shows development of 7 houses arranged in linear fashion aspected towards, and running parallel with The Droveaway. Proposed buildings are set back from The Droveaway creating a substantial green swathe between the new development and the mature vegetation running along the south eastern verge of The Droveaway.
- 5.3 A large tract of undeveloped land is retained in the north eastern quadrant of the site adjacent to the open access land at Bockell Hill.
- 5.4 A belt of tree-planting is indicated along the spine of the site, to the south east of the proposed new houses.
- 5.5 A large paddock of undeveloped land is retained between the south eastern boundary of the proposed development area and Salisbury Road.
- 5.6 Option D shows a similar arrangement with 6 houses arranged parallel with The Droveaway, but with the addition of an access into the land to the south east allowing for an additional 6 houses (12 in total).
- 5.7 Option D includes the undeveloped landscape areas to the north east and north west of the main development area. It would bring new development closer to Salisbury Rd. The linear belt of tree planting along the spine of the site shown in Option A is fragmented by the access road and additional houses.

COMMENTARY ON INDICATIVE LAYOUT OPTIONS

- 5.8 The retention of undeveloped land to the north east and north west of the development area would allow for substantial areas of planting to mitigate impacts on the open access land at Bockell Hill and on private amenity interests on The Droveaway.
- 5.9 These spaces could accommodate ecological enhancements and a degree of informal public access.
- 5.10 The proposed building on Plot 1 in both these options (south western apex of the site) is located too close to the south western boundary. A more substantial planted boundary is required here as site levels are higher than the landscape to the south west.
- 5.11 Built form should be moved further back from Public Right of Way ER26 and the existing properties beyond.

Fig. 2: APX Architecture proposed Site Layout - Option A, 20_12_04A. (not to scale).



Fig. 3: APX Architecture proposed Site Layout - Option D, 20_12_07. (not to scale).



- 5.12 A strong landscape boundary here would also allow the existing woodland in the southern apex of the site to be extended north westwards towards The Droveaway. This would strengthen the south western boundary, protect the amenity of users on the Public Right of Way and provide ecological connectivity.
- 5.13 No indication is given in the illustrative layouts to building heights, but desktop analysis and fieldwork suggest that the north eastern and south western boundaries are more sensitive in the landscape than the north western and south eastern boundaries, and for this reason consideration should be given to reduced building heights on these boundaries.
- 5.14 Proposed structural landscape intended for visual mitigation and ecological enhancement should not be conveyed into private curtilages as no control can be exercised by the local planning authority over its future management.
- 5.15 Option A indicates a substantial belt of trees along the central spine of the site that could be managed independently of private owners, possibly by a management company. Option D shows areas of structural planting that appear to be within private plots (ie between Plots 3 and 7, between Plots 9 and 10, and between Plots 8 and 12). This arrangement is unlikely to deliver the required long term landscape functionality and should the site be allocated it will be necessary to design the layout so that all mitigation planting can be successfully delivered, controlled and managed.
- 5.16 Design, layout and building heights for any new development should be advised by a Landscape and Visual Appraisal, which should include production of Zone of Visual Influence diagrams and Accurate Visual Representations (formerly referred to as verified CGIs) of the proposed development. Architectural design and selection of materials should also be informed by a study of local vernacular and building heights.

6. BASELINE MAPPING

- 6.1 Site topography is indicated opposite. The distinctive double ridge in the landscape projecting north east from St Margaret's at Cliffe is evident, with the valley between the ridges gradually opening out and becoming more shallow to the north east.
- 6.2 The topography within the site itself is gently crowned, with the south western boundary of the site set above the landscape to the south west.
- 6.3 The remainder of the mapping (below) confirms the following:
 - the site's location within AONB
 - the site is not within or adjacent to a conservation area
 - existing development is present on three sides of the site
 - the site's location within the Heritage Coast definition
 - location of nearby PROW
 - the site's location within the North Downs NCA
 - the location of SSSI in relation to the site
 - the site is not included within the Kent landscape characterisation study.

Fig. 4: Topography

Topography

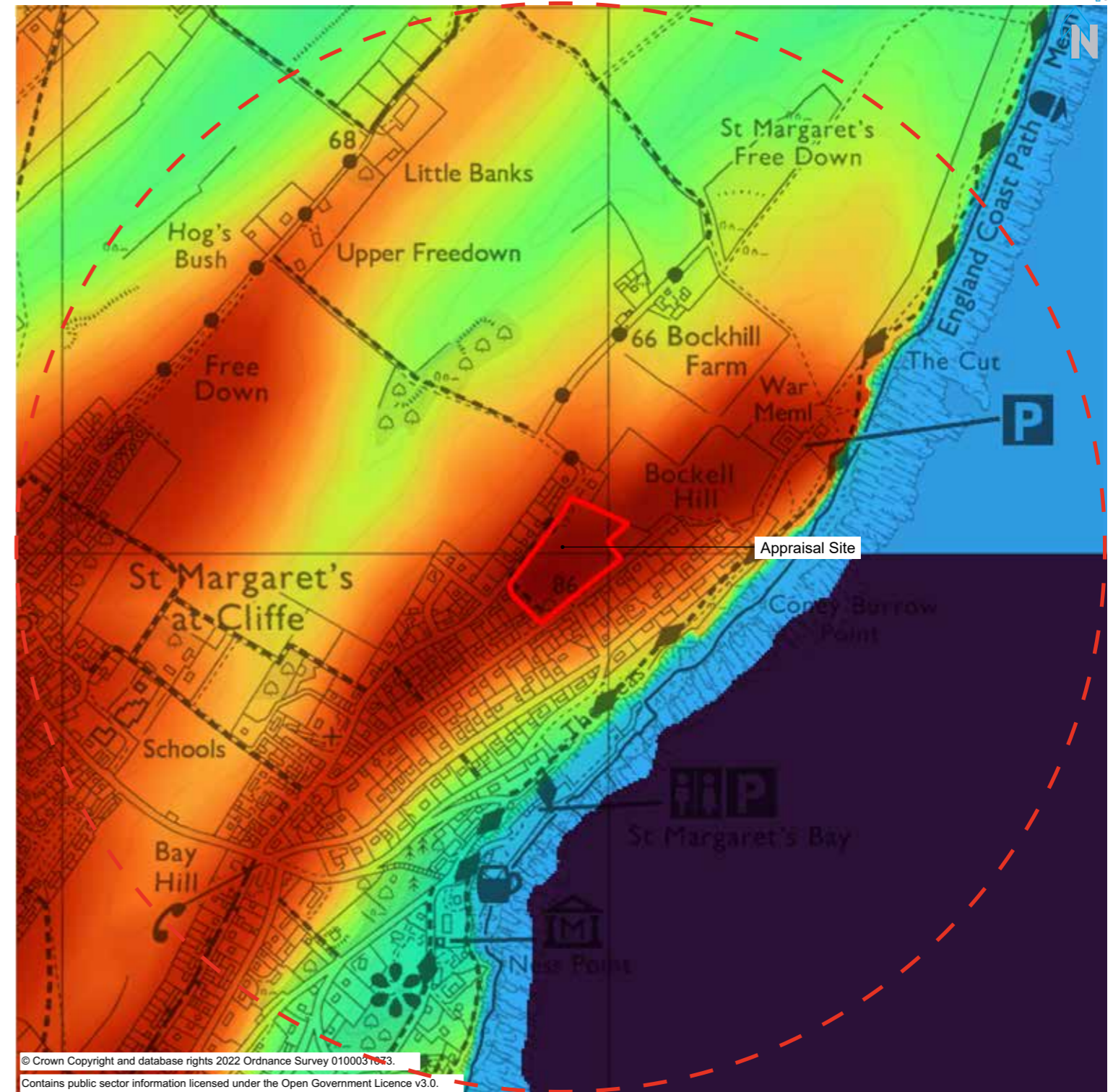
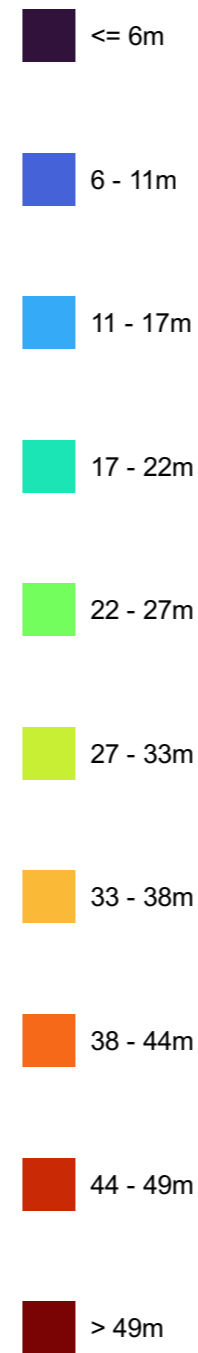




Fig. 5: Kent Downs Area of Outstanding Natural Beauty

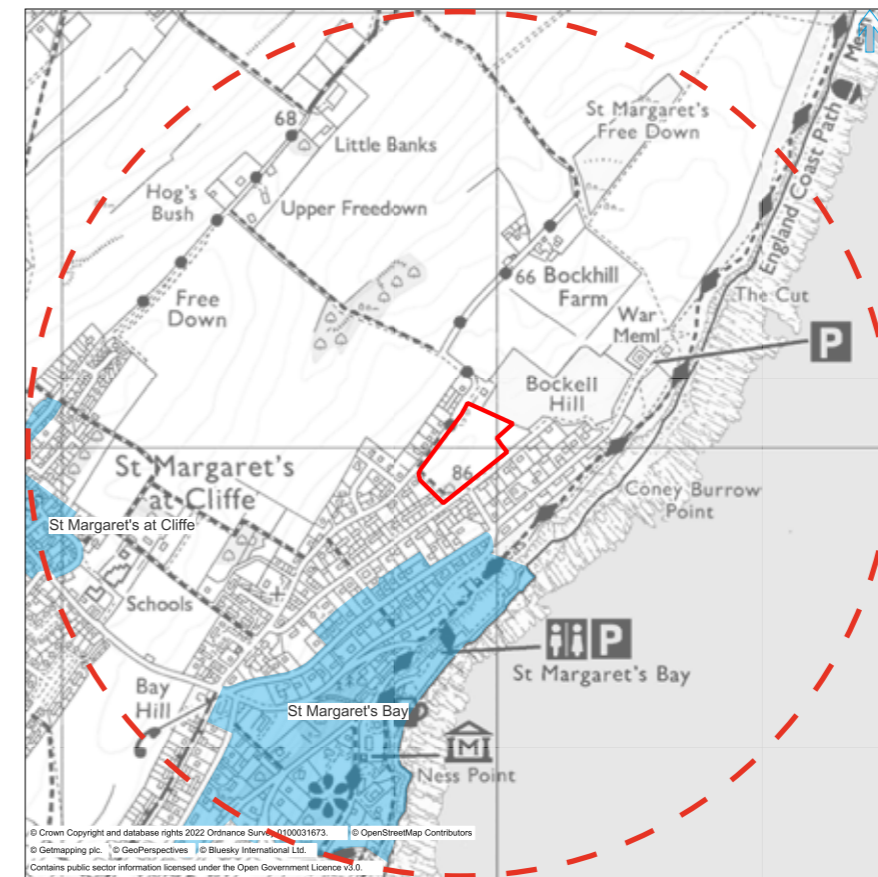


Fig. 6: Conservation Areas

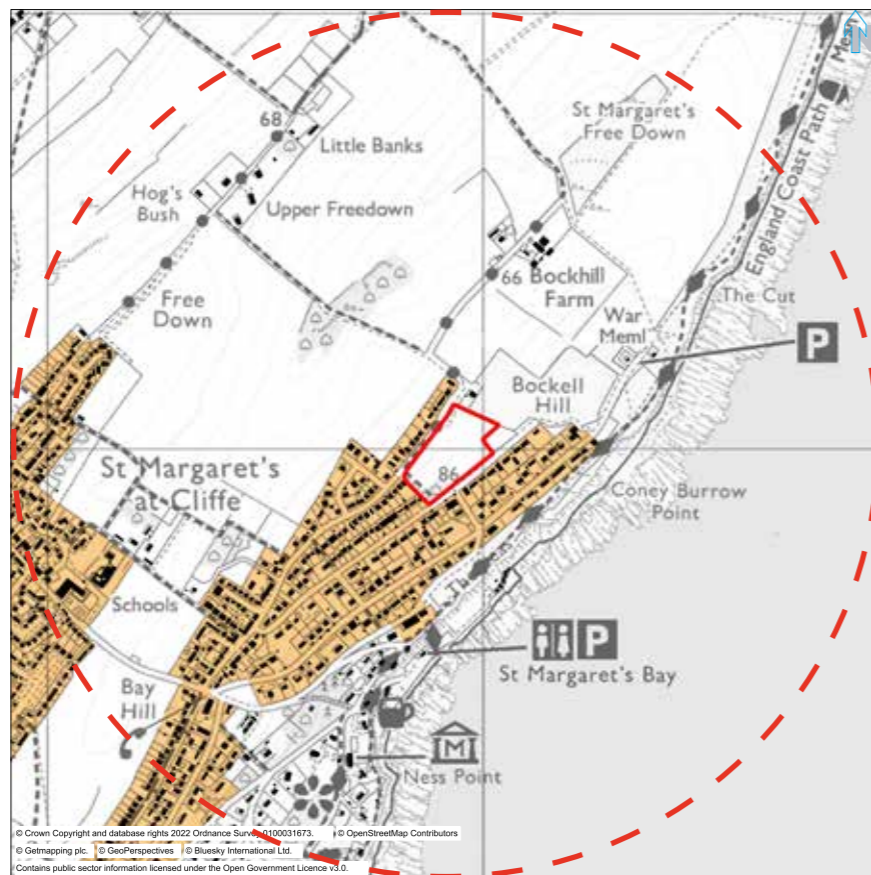


Fig. 7: Settlement Envelopes and Urban Grain



Fig. 8: Heritage Coast

6492-LLB-RP-L-0001 | LANDSCAPE AND VISUAL STATEMENT
SALISBURY ROAD, ST MARGARET'S AT CLIFFE, DOVER, KENT

S4 - STAGE APPROVAL

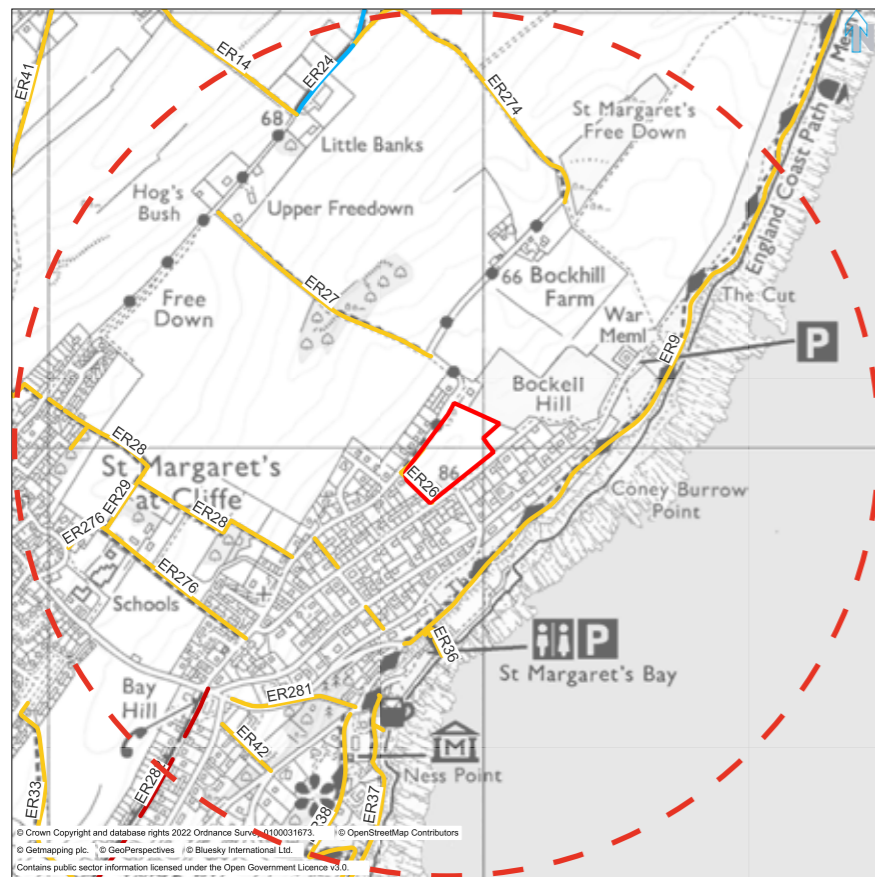


Fig. 9: Public Rights of Way

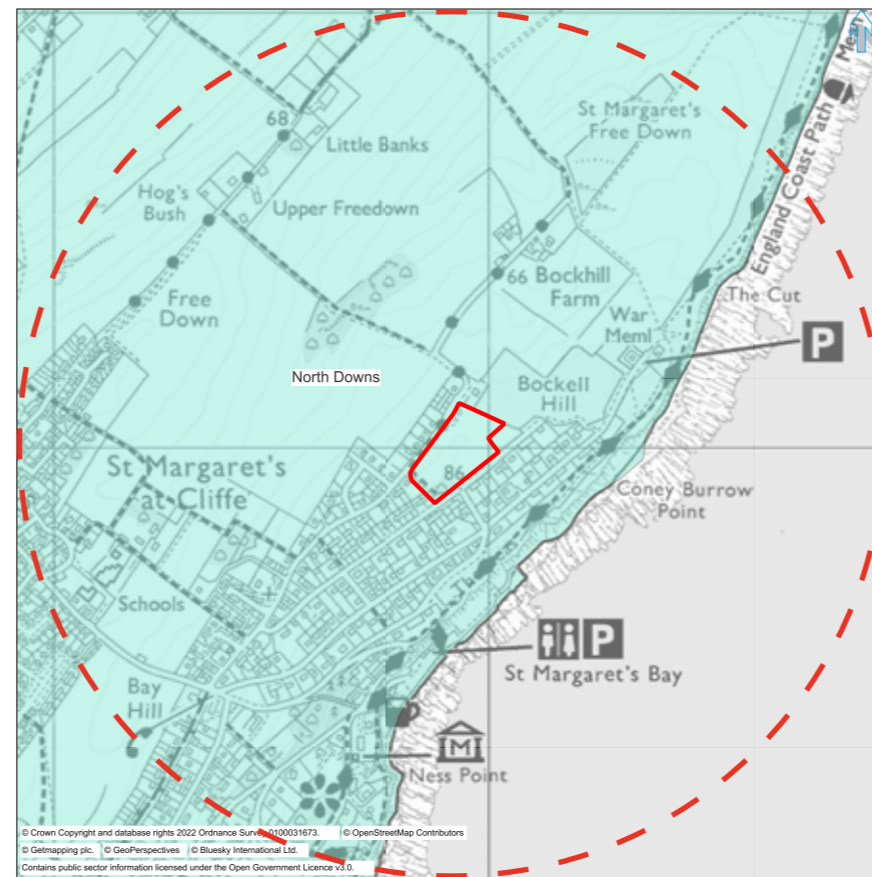


Fig. 10: National Character Area - North Downs

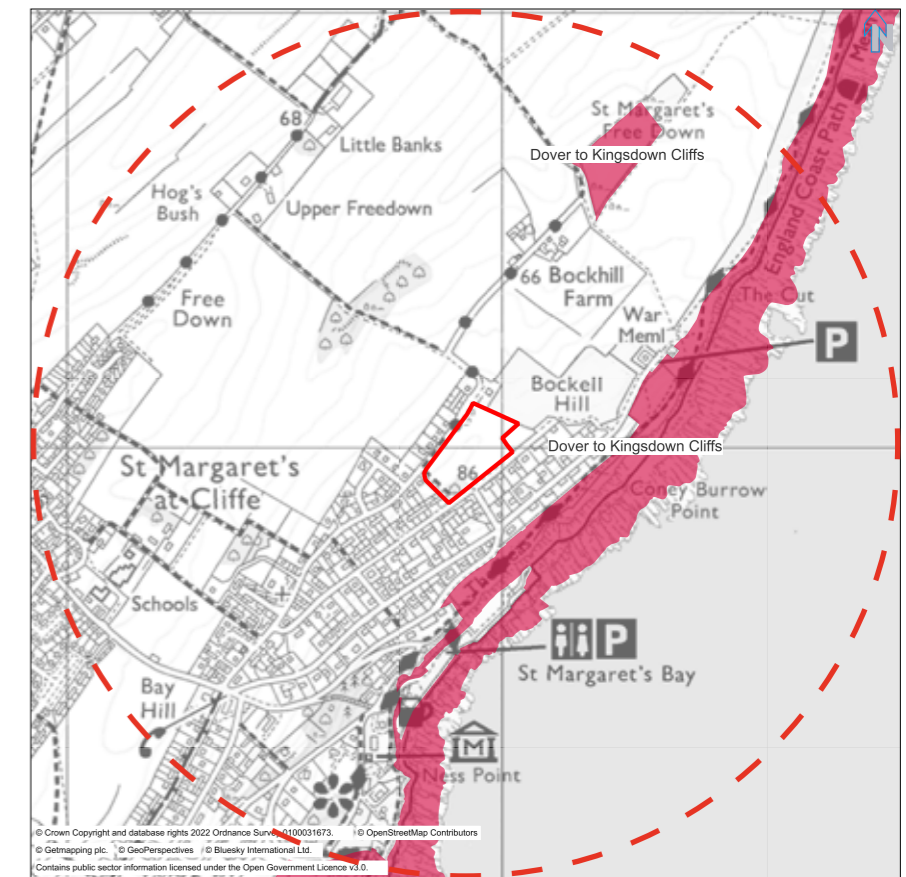


Fig. 11: Sites of Special Scientific Interest

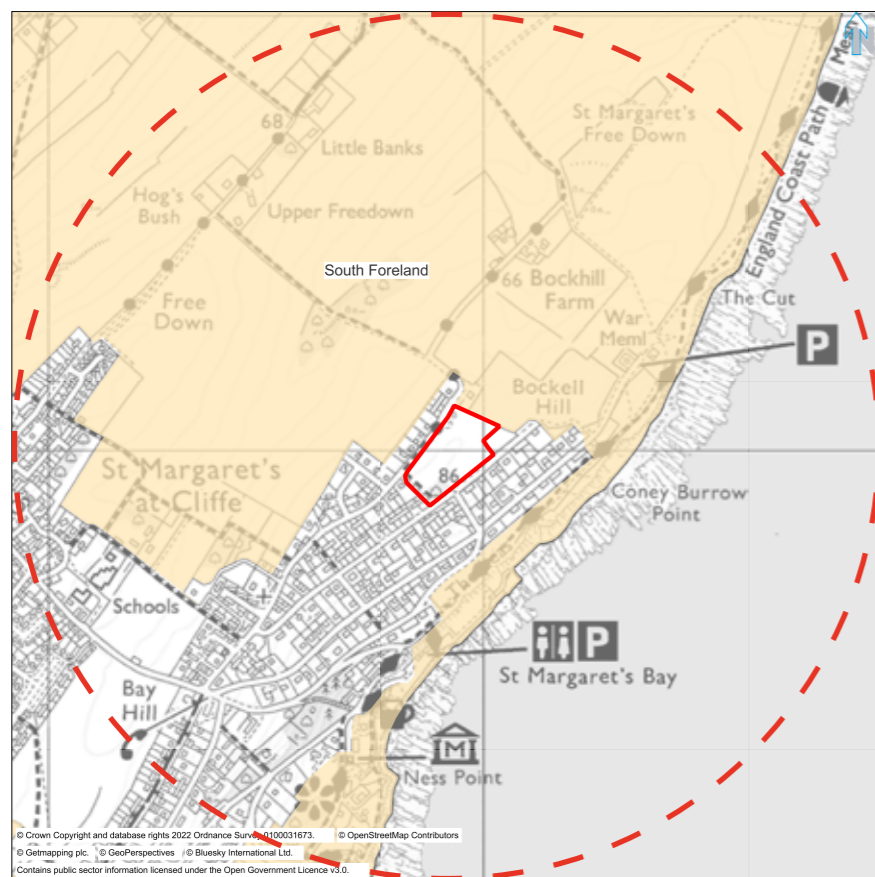


Fig. 12: Kent Landscape Character Area - South Foreland

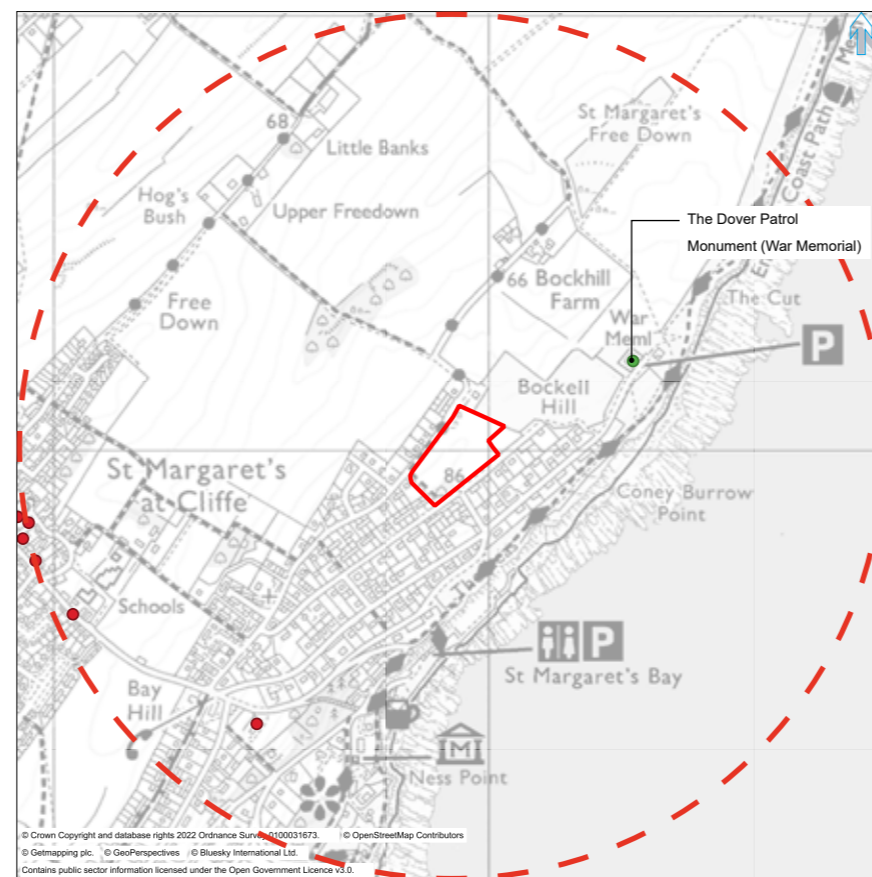


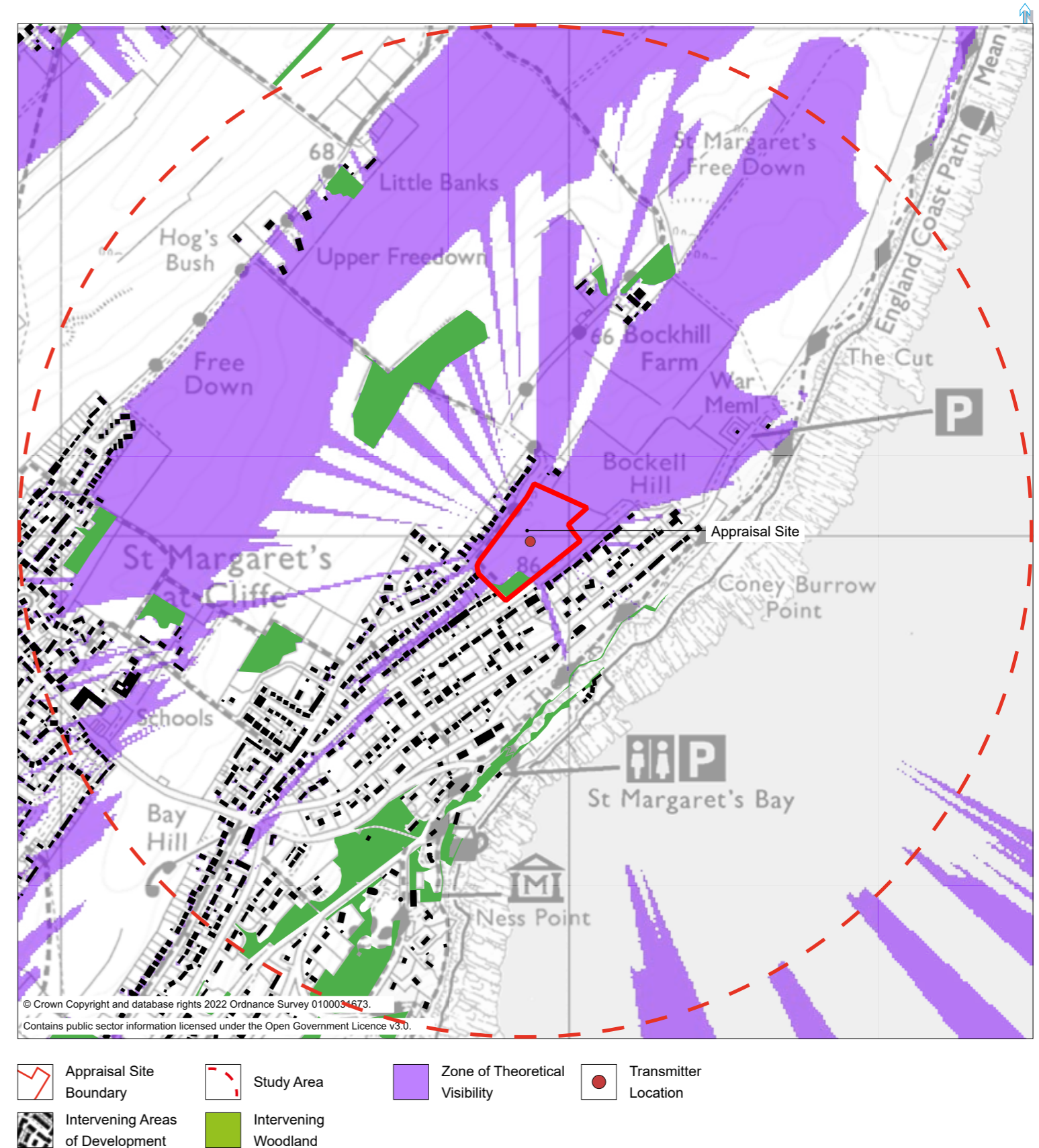
Fig. 13: Listed Buildings

8. VISUAL RECEPTOR MAPPING

Description

- 8.1 The Zone of Theoretical Visibility (ZTV) for the proposal site area is shown in the opposite figure. This diagram has been produced using QGIS computer software and is based upon standard 5m OS Terrain 5 Data. It is intended to provide an initial broad-based assessment of the likely visibility shed of the proposal site, to help establish potential publicly accessible locations from where views of the site might be gained.
- 8.2 The ZTV is **not** intended to be an accurate representation of precise areas from where views will be gained. The ZTV diagram considers only the screening effect of landform, major built up areas and major woodlands and does not take into account localised variations in landform, the presence of intervening vegetation cover, or other built structures such as walls or fences that could further affect visibility. The methodology does not take into consideration the effect of distance on views.
- 8.3 The diagram has been based upon following parameters:
 - Significant areas of development having been given a generic height of 9m.
 - Significant areas of woodland having been given a generic height of 10m
 - A transmitter height of 9 m. above existing ground level to represent a 9m high building located at OSGB36 (British National Grid) coordinates 636923.775,144990.586 to represent the approximate centre of the proposal site.
 - Receptor viewing height of 1.63m above ground level.
- 8.4 From the diagram the principal zones of potential visibility are:
 - a tract of landscape south east of Kingsdown Road
 - a cone of potential visibility extending north east from the site encompassing Bockell Hill and the Dover Patrol Memorial
 - pockets of potential visibility from St Margaret's, close to Portal House School.
 - potential views that would be gained by craft on the English Channel
- 8.5 Fieldwork confirms that potential visibility from the north west is largely restricted by vegetation along the Kingsdown Road and by intervening woodland, as well as existing development along the north western side of The Droveaway. Vegetation around the Dover Patrol Memorial and on Bockell Hill, combined with local topographical variation restricts views south east, although the north eastern boundary of the site is visible in some views from the open access land. There is no intervisibility between the site and the shoreline to the south east, and it is likely that views from craft using the Channel will be obstructed by vegetation along the site's south eastern boundary and by development along Salisbury Rd (this has not been tested by fieldwork).

Fig. 14: Ordnance survey map indicating Zones of Theoretical Visibility



9. VIEWPOINT LOCATIONS

Description

9.1 For the purposes of this statement the following visual receptor locations were visited:

- Viewpoint 1 – View south east from The Droeway
- Viewpoint 2 – View south east from path from The Droeway to open access land
- Viewpoint 3 – View north east to Bockell Hill
- Viewpoint 4 – View south west across site from access into open access land, Bockell Hill
- Viewpoint 5 – View south west adjacent to paddock
- Viewpoint 6 – View west adjacent to paddock
- Viewpoint 7 – View south west from south eastern site boundary
- Viewpoint 8 – View south from south western site boundary
- Viewpoint 9 – View north east from PROW ER26
- Viewpoint 10 – View north east along The Droeway
- Viewpoint 11 – View south west from Salisbury Rd
- Viewpoint 12 – View south east from the Dover Patrol Memorial
- Viewpoint 13 – View north from The Front

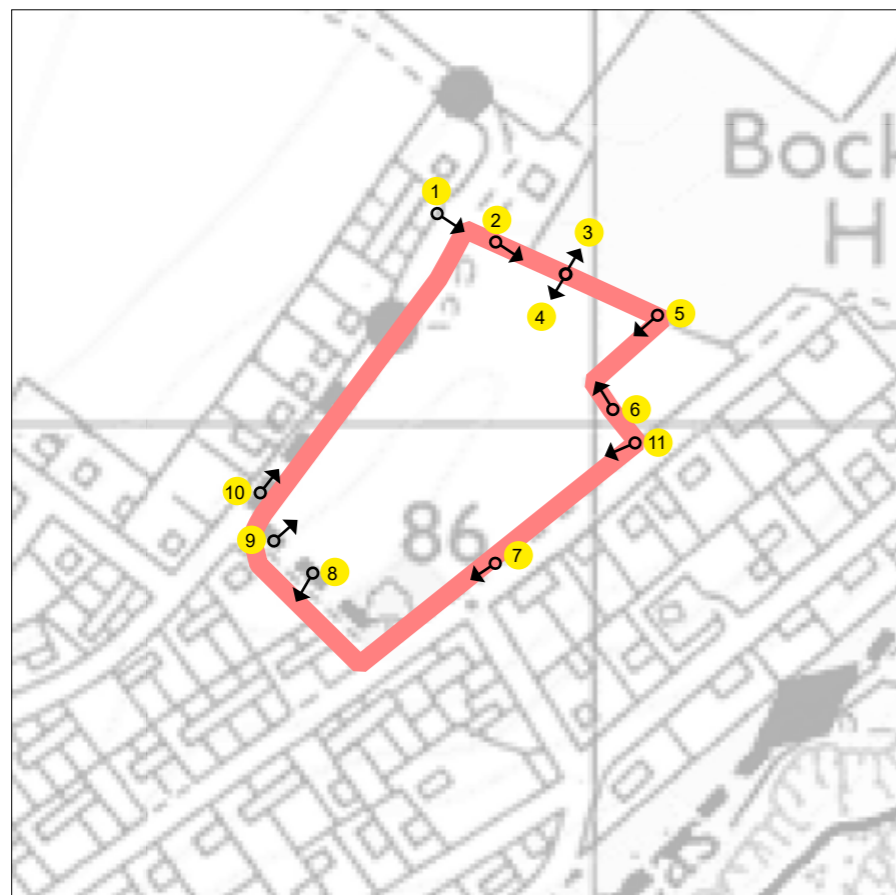


Fig. 15: Ordnance survey map indicating surrounding viewpoint locations.

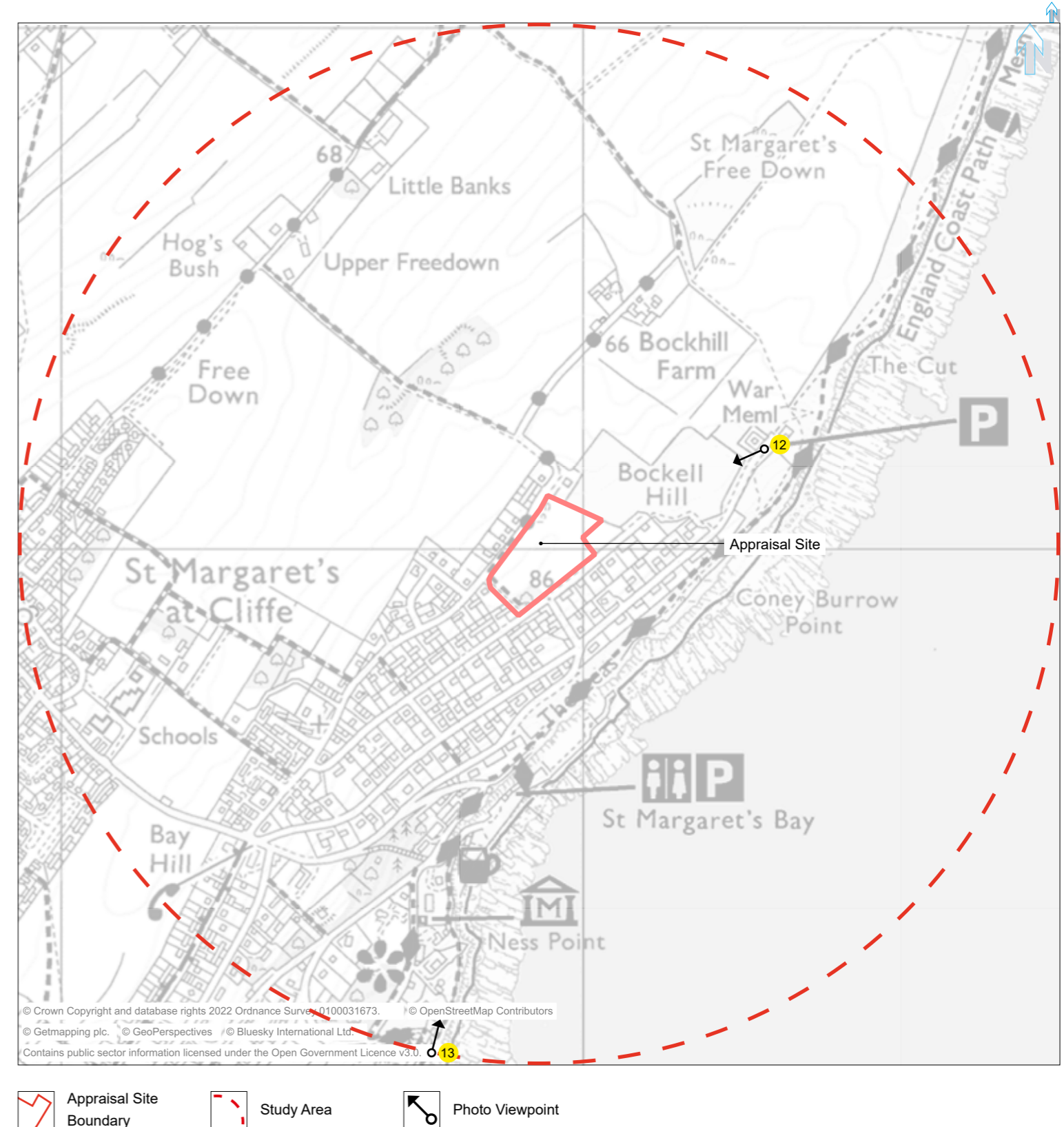




Photo 1: View south east from The Droveaway



Photo 2: View south east from path from The Droveaway to open access land



Photo 3: View north east to Bockell Hill



Photo 4: View south west across site from access into open access land, Bockell Hill



Photo 5: View south west adjacent to paddock



Photo 6: View north west adjacent to paddock



Photo 7: View south west from south eastern site boundary



Photo 8: View south from south western site boundary



Photo 9: View north east from PROW ER26



Photo 10: View north east along The Droveaway



Photo 11: View south west from Salisbury Rd



Photo 12: View south east from the Dover Patrol Memorial



Photo 13: View north from The Front

10. VISUAL CHARACTER

- 10.1 Site photographs were taken on 6 September 2023 using an iPhone 12 Pro Max. These are regular landscape photos produced for visual context only and are not intended to comply with the Landscape Institute Technical Guidance note TGN19 'Visual Representation of Development Proposals'
- 10.2 The photos were taken at a time of year when deciduous vegetation was in full leaf. The majority of vegetation in the vicinity of the site is deciduous, although evergreen pine and Holm oak are well represented in the area. Views across the landscape will penetrate further in the winter months after leaf-fall from deciduous vegetation.
- 10.3 View 1 - South east from The Droveaway shows the agricultural access to the site and the path providing access to the open access land at Bockell Hill. It also illustrates the density of vegetation along The Droveaway at this point. The vegetation belt becomes narrower to the south east, but is still substantial. The photo also shows that the site is at a slightly higher level than The Droveaway in this location.
- 10.4 View 2 - South east from path from The Droveaway to open access land is taken from a position slightly further south east. Roofs of houses on Salisbury Road are visible on the horizon in the middle distance.
- 10.5 View 3 - North east to Bockell Hill shows the informal path from the north east boundary of the site into the open access land.
- 10.6 View 4 - South west across site from access into open access land, Bockell Hill is the reciprocal view from just beyond the north eastern boundary fence, showing the woodland on the site south eastern boundary and the gently 'crown' of the site's topography.
- 10.7 View 5 - View south west adjacent to paddock shows the enclosing nature of the vegetation along the site's south eastern boundary, together with the roofs of houses along Salisbury Rd.
- 10.8 View 6 - View north west adjacent to paddock indicates the enclosing nature of the vegetation along the site's north western boundary, with glimpses of rooftops of houses along The Droveaway visible through the vegetation.
- 10.9 View 7 - View south west from the south eastern site boundary shows the roofs of development to the south west of the site boundary, just beyond the PROW, indicating that the south west boundary is elevated above the PROW and development beyond.
- 10.10 View 8 - View south from south western site boundary. This again illustrates the difference in level between the site and land to the south west. From this location there is a more distant view towards the landscape south of the village.
- 10.11 View 9 - View north east from PROW ER26. This is gained through a gap in the hedgerow, and illustrates the change in level at this point and the distant view of the upper part of the Dover Patrol Memorial, above the trees.
- 10.12 View 10 - View north east along The Droveaway. This illustrates the nature of the vegetation on the verge along the south eastern side of The Droveaway.
- 10.13 View 11 - View south west from Salisbury Rd. This illustrates the nature of the vegetation on the verge along the north western side of Salisbury Road.
- 10.14 View 12 - View south east from the Dover Patrol Memorial. This indicates the nature of the vegetation around the memorial which restricts views south.
- 10.15 View 13 - View north from The Front. This view north from publicly access land on the cliff tops shows the setting of St Margaret's Bay with the cliff face and settlement above. The site is located behind the trees and woodland block on the horizon in the position indicated by the black arrow.

7. CONCLUSION

- 7.1 This is a report of a scoping exercise supported by desktop study and fieldwork. It does not represent a detailed Landscape and Visual Impact Assessment.
- 7.2 The prevailing landscape and visual characteristics of the area are well documented at national down to local level. The AONB and Heritage Coast designations underline the sensitivity of the site and its context.
- 7.3 The site has undergone a landscape sensitivity assessment in relation to AONB and Heritage Coast. The 2021 Dover District Council 'Landscape Sensitivity Assessment of proposed development sites' concluded that *'the site is able to accommodate residential development in some situations without significant landscape/ visual change. Many aspects of development (with appropriate design and mitigation) could potentially relate to the area'*.
- 7.4 The consultation response from the AONB Unit raises concerns about the topography of the site and potential corresponding impacts on views and character of the AONB.
- 7.5 Having visited the site and undertaken desktop research I conclude that the north eastern and south western boundaries of the site are more sensitive in the landscape than the north western and south eastern boundaries, and that potential impacts on these boundaries resulting from the introduction of development on the site can be satisfactorily mitigated through sensitive layout and design.