



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

Matter 3 – Housing Allocations

Issue 8 – Kingsdown Housing Sites

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Policy SAP34 – Land at Woodhill Farm

Q1 What is the capacity of the site based on? Is it justified?

Q1 DDC Response:

1. 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 site specific factors after further assessment to mitigate visual and landscape impact on the AONB was undertaken, a requirement highlighted by the HELAA 2020 Landscape Assessment (GEB09d) which gave an Amber RAG rating for landscape impacts¹.
2. It was determined that with the reduced capacity and density of around 15dph with sensitive design and screening the negative effects set out in the HELAA and Sustainability Appraisal these could be mitigated through the design and layout of development.
3. Site capacities referred to in the Plan's site policies are indicative and it remains the responsibility of the applicant in bringing forward a planning application to demonstrate how their proposed scheme (including its quantum of development) is in conformity with the Plan taken as a whole. At this time, it is considered that 50 units is a justified indicative capacity for the allocation, taking into account these factors.

Q2 What effect will the allocation have on the landscape character of the area, having particular regard to views to and from the AONB?

Q2 DDC Response:

4. 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

¹ [GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx \(live.com\)](#)



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Downs AONB Unit. 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 received from the AONB unit stating that the landscape has visibility with the AONB, and shares landscape characteristics. If allocated the policy must incorporate mitigation requirements. The overall conclusion was that the development of the site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated.
 - The site was subject to sustainability appraisal prior to the Regulation 18 consultation in January 2021. Both documents were subject to consultation.
 - Post the Reg 18 stage, consultation with the AONB Unit (HELAA Appendix 3g)² resulted in a comment which removed the objection to the allocation, and supported changes to policy wording regarding development design, landscape buffer and tree planting.
 - In 2022 the HELAA identified the site as 'suitable' (HELAA 2022 Appendix 1a)³ and the site was subject to Sustainability Appraisal which informed the final selection of sites. The suitability assessment concluded that the site would form a logical extension to the settlement; however, given the sites position and its relationship to the AONB, sensitive design and mitigation would be required to mitigate 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 Amendments (SD06) proposes some Additional Amendments (AM61)
5. The Kent Downs AONB Unit have agreed the following in the Statement of Common Ground:

'It is agreed that the proposed development could impact on the setting of the AONB given its proximity to the AONB and sensitivity of the site increased by its high topography. It is also agreed that criteria a, b, c and e of the Policy SAP34 can manage these potential impacts through a sensitively designed scheme, that is set back from the western boundary of the site, with a landscape and visual impact

² [GEB09d-HELAA-Appendix-3-a-to-g-HELAA-2020-Site-Assessments-October-2022.xlsx \(live.com\)](#)

³ [GEB09b-HELAA-Appendix-1-a-to-c-HELAA-2022-Site-Assessments-October-2022.xlsx \(live.com\)](#)



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assessment informing the provision of landscape buffers, structural planting and advanced tree planting⁴.

Q3 What is the justification for requiring the primary access to be taken from Ringwould Road? How have effects on the highways network and safety been considered?

Q3 DDC Response:

6. 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 Regulation 19 Transport Modelling Forecasting Report⁴. Land at Woodhill Farm was included in this. The strategic model predicts the impacts that the Local Plan sites will have on the highway network and identifies any issues which are being generated by the proposed development. The areas where the Local Plan impacts the highway network have been identified and where necessary mitigation developed.
7. Initial consultation with KCC Highways on the site carried out as part of the 2020 HELAA assessment concluded that further information was required in relation to the access on Ringwould Road, and whether it was feasible without additional land. The developers subsequently provided more detailed information through the KCC Highways pre-application advice service, which showed the potential for some realignment of land within the same ownership of the site promoter. KCC Highways confirmed during the Regulation 18 consultation that the access arrangements were suitable.
8. KCC Highways also raised the issue about the impacts on the Duke of York Roundabout requiring assessment, and this site does fall within the proportionate contribution tariff zone to providing funding towards the required mitigation, as set out within Appendix 3 of the IDP.
9. To add further clarity to the requirements of the realignment of Ringwould Road, which are needed to provide the suitable access with the required visibility splays and footway/cycleway connections, the council proposes a further modification, which has been agreed with KCC Highways as part of ongoing collaboration in preparing a response to these questions.

⁴ TIEB02 Regulation 19 Transport Modelling Forecasting



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Proposed Post Submission Modification

10. f) Primary vehicular, pedestrian and cycle access to the site shall be provided from Ringwould Road. This requires alignment of Ringwould Road to enable required visibility splays and footway/cycle ways to be achieved;
11. In addition, a modification has been proposed through SD06 in relation to the connections and improvements to the PROW network, which have been agreed in the Statement of Common Ground between the council and KCC. Pedestrian and cycle connections to the neighbouring open space should be provided where possible. In addition, improvements and/or connections to the Public Right of Way and Bridleway network should be provided, where possible.
12. The Council considers that these changes are necessary for soundness, to ensure the policy is justified by the evidence and accords with national policy.

**Q4 What is the justification for the suggested changes to Policy SAP34?
Why are they necessary for soundness?**

Q4 DDC Response:

13. The suggested changes to criteria within SDO6⁵ detailed within **AM61** are made following consultation representations on the submission plan. Amendment to e) would provide additional clarity with regard to the timing of advance tree planting to reduce the impact of development on the setting of the AONB, as set out in the response to Question 2 above. The suggested changes to criteria g) would highlight the opportunity for the scheme to be integrated into the PROW network.
14. The deletion of criterion h) has been suggested following the recommendations of the updated Habitats Regulations Assessment (March 2023)⁶ as set out in the Council's response to Matter 1 Issue 7 Question 2.
15. The Council considers these modifications are necessary for soundness to ensure the Plan is justified and reflects the evidence base and national policy.

⁵ [SD06 Schedule of Additional Modifications to the Regulation 19 Submission Plan March 2023 \(doverdistrictlocalplan.co.uk\)](#)

⁶ [SD09 Habitats Regulations Assessment March 23](#)



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Policy SAP35 – Land adjacent to Courtlands

Q1 What effect will the allocation have on the landscape character of the area, having particular regard to any potential for coalescence between Kingsdown and Walmer?

Q1 DDC Response:

16. The potential impacts of development on the character and appearance of the area, has been considered through the Council's assessment of sites in the HELAA and SA. This has been an iterative assessment through the plan making process, taking account of responses received through consultation as described below:
- The site was submitted during the Targeted Call for Sites, which took place at the same time as the Regulation 18 consultation in January – March 2021. A landscape assessment (HELAA Targeted Call for Sites Assessment, Appendix 2c)⁷ completed by officers concluded that the development of the site would have an impact on the landscape and further assessment is required to demonstrate whether this can be mitigated. The site was assessed as having no heritage impact.
 - 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. It was concluded that the site would form a logical extension to the settlement area, that and the western and northern boundaries will require mitigation on the impacts to the open countryside beyond. Constraints were considered to be capable of mitigation.
 - The site was subject to public consultation at the Regulation 19 stage.
17. The site has been allocated for up to 5 dwellings and is approximately 0.5ha, creating the opportunity for a lower density development. The site forms a small and logical extension to the Kingsdown, located between existing built form. Development would not extend the northern boundary of Kingsdown beyond that of existing lower density development to the east. For these reasons, the potential of the site to create a sense of coalescence between Kingsdown and Walmer is determined to be unlikely.

⁷ [GEB09c Appendix 2 a-g HELAA Targeted Call for Sites Assessment \(October 2022\)](#)

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



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18. The Council would be happy to propose a post submission modification to Policy SAP35 requiring existing trees and hedgerows to be enhanced with a robust landscape buffer provided along the western and northern boundaries should the Inspectors consider that this is necessary and appropriate.